

**UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

EMERGENCY PHYSICIAN SERVICES OF  
NEW YORK, ET AL.,

Plaintiff,

-against-

UNITEDHEALTH GROUP, INC., ET AL.,

Defendant.

Case No. 1:20-cv-09183-AJN

Hon. Alison J. Nathan

**UNITEDHEALTH GROUP, INC.’S  
ANSWER AND AFFIRMATIVE  
DEFENSES**

Pursuant to Rules 7 and 8 of the Federal Rules of Civil Procedure, Defendant UnitedHealth Group, Inc. (“United”),<sup>1</sup> by and through its undersigned counsel, responds to the allegations of Plaintiffs Emergency Physician Services of New York, Buffalo Emergency Associates, Exigence Medical of Binghamton, Exigence Medical of Jamestown, and Emergency Care Services of New York’s Complaint for Damages and Declaratory Relief (ECF No. 1) (“Complaint”):

### **ANSWER**

Unless specifically admitted, United denies all of the allegations in the numbered paragraphs of the Complaint, and further denies that it was responsible for, or liable for, any of the happenings or events mentioned in the Complaint. Any admission herein is limited to the express language of the response and shall not be deemed an implied admission of additional facts. United need not admit or deny legal conclusions or arguments. Although United need not admit or deny legal conclusions or arguments, United affirmatively denies that it has violated any applicable federal or state law, and asserts that Plaintiffs should be denied all of the relief they request. United does not repeat the heading set forth in the Complaint. To the extent any headings require a response, and to the extent any headings contain any factual allegations, they are denied.

United answers the individual allegations of the Complaint as follows:

1. United admits that there is an ongoing global coronavirus pandemic that has caused numerous illnesses and claimed numerous lives. United lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 1 and, on that basis, denies them.

2. United lacks knowledge or information sufficient to form a belief as to the truth of

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<sup>1</sup> UnitedHealth Group, Inc. does not itself administer health plans or adjudicate health claims. It is anticipated that, once Plaintiffs produce the list of health claims they are placing at issue in this case, United will identify the specific entities that adjudicated those particular claims, and will work cooperatively with Plaintiffs so that they can amend the Complaint to name the proper defendants.

the allegations in Paragraph 2 and, on that basis, denies them.

3. UnitedHealth Group, Inc. has 12 wholly owned, direct subsidiaries. United complies with all fiduciary duties to its shareholders. United lacks knowledge or information sufficient to form a belief as to the vague and ambiguous characterization of Multiplan in the third sentence of Paragraph 3, and on that basis, denies them. United denies the remaining allegations in Paragraph 3.

4. United denies the allegations in Paragraph 4.

5. United lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 5 and, on that basis, denies them.

6. Paragraph 6 sets forth legal conclusions that require no response. To the extent any further response is required, United denies the allegations in Paragraph 6.

7. United denies it is liable to Plaintiffs in any fashion or in any amount. United denies the remaining allegations in Paragraph 7.

8. United admits that the cited article states the information Plaintiffs allege in the first sentence of Paragraph 8.

9. United admits that Multiplan contracts with numerous insurers concerning a variety of services that it generally offers to the marketplace. United lacks knowledge or information sufficient to form a belief as to the vague and ambiguous characterizations of Multiplan in Paragraph 9, and on that basis, denies them. United lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 9 and, on that basis, denies them.

10. United denies the allegations in Paragraph 10.

11. Paragraph 11 sets forth legal conclusions that require no response. To the extent

any further response is required, United denies the allegations in Paragraph 11.

12. United denies the allegations in Paragraph 12.

13. United admits that Plaintiffs purport to seek monetary, injunctive, and declaratory relief under the Federal Racketeer Influenced and Corrupt Organizations (“RICO”) Act and New York state law, many of which have been dismissed. United denies that Plaintiffs are entitled to any relief. United denies any remaining allegations in Paragraph 13.

14. United admits that Plaintiffs purport to bring a federal RICO action pursuant to 18 U.S.C. § 1964(c) and 18 U.S.C. § 1964(d), which have been dismissed, but denies that it is liable in any fashion.

15. Paragraph 15 sets forth legal conclusions that require no response. To the extent any further response is required, United denies the allegations in Paragraph 11.

16. Paragraph 16 sets forth legal conclusions that require no response. To the extent any further response is required, United denies the allegations in Paragraph 16.

17. Paragraph 17 sets forth legal conclusions that require no response. To the extent any further response is required, United denies the allegations in Paragraph 17.

18. Paragraph 18 sets forth legal conclusions that require no response. To the extent any further response is required, United denies the allegations in Paragraph 18.

19. Paragraph 19 sets forth legal conclusions that require no response. To the extent any further response is required, United denies the allegations in Paragraph 19.

20. United admits that some United subsidiaries contract with Multiplan. United denies the remaining allegations in Paragraph 20.

21. United denies the allegations in Paragraph 21.

22. United admits that Plaintiffs purport to bring state law claims, some of which have

been dismissed. United denies it is liable in any fashion. The remaining allegations in Paragraph 22 set forth legal conclusions to which no response is required.

23. United admits that Plaintiffs purport to bring state law claims for breach of implied-in-fact contract, unjust enrichment and declaratory relief, some of which have been dismissed. United denies it is liable in any fashion.

24. United lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 24 and, on that basis, denies them. To the extent these allegations require further response, United denies the allegations in Paragraph 24.

25. United lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 25 and, on that basis, denies them.

26. United lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 26 and, on that basis, denies them.

27. United lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 27 and, on that basis, denies them.

28. United lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 28 and, on that basis, denies them.

29. United lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 29 and, on that basis, denies them.

30. United admits that UnitedHealth Group, Inc. is a Delaware corporation with its principal place of business at 9900 Bren Road East, Minnetonka, Minnesota. UnitedHealth Group, Inc. has 12 wholly owned, direct subsidiaries. United complies with all fiduciary duties to its shareholders. United's mission is: "UnitedHealth Group is a diversified health care company with a mission to help people live healthier lives and help make the health system work better for

everyone.”

- UnitedHealth Group, Inc. is the corporate parent of United HealthCare Services, Inc. United admits that United HealthCare Services, Inc. is a Minnesota corporation and that the following are related names of United HealthCare Services, Inc.: AmeriChoice, EverCare, Health Professionals Review, Healthmarc, HealthPro, Institute for Human Resources, United Management Company, United Management Company, Inc., United HealthCare Corporation, United HealthCare Management Company, Inc., United HealthCare Management Services, United HealthCare Services of Minnesota, United HealthCare Services of Minnesota, Inc., and United Resource Networks, Inc.
- United admits that UnitedHealthcare of New York, Inc. is organized under the laws of New York. United admits that UnitedHealthCare Community Plan is a related name of UnitedHealthcare of New York Inc.
- United admits that UnitedHealthcare, Inc. is a Delaware corporation and an indirect subsidiary of UnitedHealth Group, Inc.

United denies the remaining allegations in Paragraph 30.

31. United admits that it has other subsidiaries. United denies the remaining allegations in Paragraph 31.

32. United denies the allegations in Paragraph 32.

33. United admits that a list of subsidiaries is identified in its 2019 10-K Annual Report.

34. United admits that Multiplan provides various services, including Data iSight services, to numerous insurers, including United subsidiaries. United lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 34

and, on that basis, denies them.

35. Paragraph 35 sets forth legal conclusions that require no response. To the extent any further response is required, United denies the allegations in Paragraph 35.

36. Paragraph 36 sets forth legal conclusions that require no response. To the extent any further response is required, United denies the allegations in Paragraph 36.

37. Paragraph 37 sets forth legal conclusions that require no response. To the extent any further response is required, United denies the allegations in Paragraph 37.

38. United lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 38 and, on that basis, denies them.

39. United lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 39 and, on that basis, denies them.

40. United denies that it “underpaid” any claims. United lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 40 and, on that basis, denies them.

41. United lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 41 and, on that basis, denies them.

42. United lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 42 and, on that basis, denies them.

43. Paragraph 43 sets forth legal conclusions that require no response. To the extent any further response is required, United responds that the terms and conditions of member benefit plans speak for themselves and denies any remaining allegations in Paragraph 43.

44. United lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 44 and, on that basis, denies them.

45. United lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 45 and, on that basis, denies them.

46. United lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 46 and, on that basis, denies them.

47. United admits that several of the Plaintiffs submitted numerous claims to United, using interstate wire communications to submit at least some of them. United lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 47 and, on that basis, denies them.

48. United admits that providers can submit claims through a portal. United lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 48 and, on that basis, denies them.

49. Paragraph 49 sets forth legal conclusions that require no response. To the extent any further response is required, United denies the allegations in Paragraph 49.

50. United lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 50 and, on that basis, denies them.

51. United denies the allegations in Paragraph 51.

52. United denies the allegations in Paragraph 52

53. On information and belief, United admits that MultiPlan's Data iSight tool makes pricing recommendations for professional claims based on a number of factors. United denies the remaining allegations in Paragraph 53.

54. United denies the allegations in Paragraph 54.

55. United denies that it made any fraudulent representations. It is unclear what specific payments Plaintiffs are placing at issue, or what specific representations this Paragraph is



referring to, and on that basis United denies the remaining allegations in Paragraph 55.

56. United denies the allegations in Paragraph 56.

57. United denies the allegations in Paragraph 57.

58. United denies the allegations in Paragraph 58.

59. Paragraph 59 sets forth legal conclusions that require no response. To the extent any further response is required, United denies the allegations in Paragraph 59.

60. United denies the allegations in Paragraph 60.

61. United denies the allegations in Paragraph 61.

62. United denies the allegations in Paragraph 62.

63. United denies the allegations in Paragraph 63.

64. United denies that it underpays healthcare claims, and on that basis denies the allegations in the first sentence of Paragraph 64. United denies the remaining allegations in Paragraph 64.

65. United lacks knowledge or information sufficient to form a belief as to what healthcare claims Plaintiffs are placing at issue. On that basis, United denies the allegations in Paragraph 65.

66. The allegations in Paragraph 66 are too vague and ambiguous to permit a response and, on that basis, United denies them.

67. Paragraph 67 sets forth legal conclusions that require no response. To the extent any further response is required, United denies the allegations in Paragraph 67.

68. United denies the allegations in Paragraph 68.

69. Paragraph 69 sets forth legal conclusions that require no response. To the extent any further response is required, United denies the allegations in Paragraph 69.

70. Paragraph 70 sets forth legal conclusions that require no response. To the extent any further response is required, United denies the allegations in Paragraph 70.

71. Paragraph 71 sets forth legal conclusions that require no response. To the extent any further response is required, United denies the allegations in Paragraph 71.

72. Paragraph 72 sets forth legal conclusions that require no response. To the extent any further response is required, United denies the allegations in Paragraph 72.

73. Paragraph 73 sets forth legal conclusions that require no response. To the extent any further response is required, United denies the allegations in Paragraph 73.

74. Paragraph 74 sets forth legal conclusions that require no response. To the extent any further response is required, United denies the allegations in Paragraph 74.

75. Paragraph 75 sets forth legal conclusions that require no response. To the extent any further response is required, United denies the allegations in Paragraph 75.

76. Paragraph 76 sets forth legal conclusions that require no response. To the extent any further response is required, United denies the allegations in Paragraph 76.

77. Paragraph 77 sets forth legal conclusions that require no response. To the extent any further response is required, United denies the allegations in Paragraph 77.

78. United denies the allegations in Paragraph 78.

79. Paragraph 79 sets forth legal conclusions that require no response. To the extent any further response is required, United denies the allegations in Paragraph 79.

80. Paragraph 80 sets forth legal conclusions that require no response. To the extent any further response is required, United denies the allegations in Paragraph 80.

81. Paragraph 81 sets forth legal conclusions that require no response. To the extent any further response is required, United denies the allegations in Paragraph 81.

82. Paragraph 82 sets forth legal conclusions that require no response. To the extent any further response is required, United denies the allegations in Paragraph 82.

83. The allegations in Paragraph 83 do not warrant a response in light of the Court's September 28, 2021 order granting United's Motion to Dismiss in part. To the extent any response is required, United denies the allegations in Paragraph 83.

84. The allegations in Paragraph 84 do not warrant a response in light of the Court's September 28, 2021 order granting United's Motion to Dismiss in part. To the extent any response is required, United denies the allegations in Paragraph 84.

85. The allegations in Paragraph 85 do not warrant a response in light of the Court's September 28, 2021 order granting United's Motion to Dismiss in part. To the extent any response is required, United denies the allegations in Paragraph 85.

86. The allegations in Paragraph 86 do not warrant a response in light of the Court's September 28, 2021 order granting United's Motion to Dismiss in part. To the extent any response is required, United denies the allegations in Paragraph 86.

87. The allegations in Paragraph 87 do not warrant a response in light of the Court's September 28, 2021 order granting United's Motion to Dismiss in part. To the extent any response is required, United denies the allegations in Paragraph 87.

88. The allegations in Paragraph 88 do not warrant a response in light of the Court's September 28, 2021 order granting United's Motion to Dismiss in part. To the extent any response is required, United denies the allegations in Paragraph 88.

89. The allegations in Paragraph 89 do not warrant a response in light of the Court's September 28, 2021 order granting United's Motion to Dismiss in part. To the extent any response is required, United denies the allegations in Paragraph 89.

90. The allegations in Paragraph 90 do not warrant a response in light of the Court's September 28, 2021 order granting United's Motion to Dismiss in part. To the extent any response is required, United denies the allegations in Paragraph 90.

91. The allegations in Paragraph 91 do not warrant a response in light of the Court's September 28, 2021 order granting United's Motion to Dismiss in part. To the extent any response is required, United denies the allegations in Paragraph 91.

92. The allegations in Paragraph 92 do not warrant a response in light of the Court's September 28, 2021 order granting United's Motion to Dismiss in part. To the extent any response is required, United denies the allegations in Paragraph 92.

93. The allegations in Paragraph 93 do not warrant a response in light of the Court's September 28, 2021 order granting United's Motion to Dismiss in part. To the extent any response is required, United denies the allegations in Paragraph 93.

94. The allegations in Paragraph 94 do not warrant a response in light of the Court's September 28, 2021 order granting United's Motion to Dismiss in part. To the extent any response is required, United denies the allegations in Paragraph 94.

95. The allegations in Paragraph 95 do not warrant a response in light of the Court's September 28, 2021 order granting United's Motion to Dismiss in part. To the extent any response is required, United denies the allegations in Paragraph 95.

96. The allegations in Paragraph 96 do not warrant a response in light of the Court's September 28, 2021 order granting United's Motion to Dismiss in part. To the extent any response is required, United denies the allegations in Paragraph 96.

97. The allegations in Paragraph 97 do not warrant a response in light of the Court's September 28, 2021 order granting United's Motion to Dismiss in part. To the extent any response

is required, United denies the allegations in Paragraph 97.

98. The allegations in Paragraph 98 do not warrant a response in light of the Court's September 28, 2021 order granting United's Motion to Dismiss in part. To the extent any response is required, United denies the allegations in Paragraph 98.

99. The allegations in Paragraph 99 do not warrant a response in light of the Court's September 28, 2021 order granting United's Motion to Dismiss in part. To the extent any response is required, United denies the allegations in Paragraph 99.

100. The allegations in Paragraph 100 do not warrant a response in light of the Court's September 28, 2021 order granting United's Motion to Dismiss in part. To the extent any response is required, United denies the allegations in Paragraph 100.

101. The allegations in Paragraph 101 do not warrant a response in light of the Court's September 28, 2021 order granting United's Motion to Dismiss in part. To the extent any response is required, United denies the allegations in Paragraph 101.

102. The allegations in Paragraph 102 do not warrant a response in light of the Court's September 28, 2021 order granting United's Motion to Dismiss in part. To the extent any response is required, United denies the allegations in Paragraph 102.

103. The allegations in Paragraph 103 do not warrant a response in light of the Court's September 28, 2021 order granting United's Motion to Dismiss in part. To the extent any response is required, United denies the allegations in Paragraph 103.

104. The allegations in Paragraph 104 do not warrant a response in light of the Court's September 28, 2021 order granting United's Motion to Dismiss in part. To the extent any response is required, United denies the allegations in Paragraph 104.

105. The allegations in Paragraph 105 do not warrant a response in light of the Court's

September 28, 2021 order granting United's Motion to Dismiss in part. To the extent any response is required, United denies the allegations in Paragraph 105.

106. The allegations in Paragraph 106 do not warrant a response in light of the Court's September 28, 2021 order granting United's Motion to Dismiss in part. To the extent any response is required, United denies the allegations in Paragraph 106.

107. The allegations in Paragraph 107 do not warrant a response in light of the Court's September 28, 2021 order granting United's Motion to Dismiss in part. To the extent any response is required, United denies the allegations in Paragraph 107.

108. The allegations in Paragraph 108 do not warrant a response in light of the Court's September 28, 2021 order granting United's Motion to Dismiss in part. To the extent any response is required, United denies the allegations in Paragraph 108.

109. The allegations in Paragraph 109 do not warrant a response in light of the Court's September 28, 2021 order granting United's Motion to Dismiss in part. To the extent any response is required, United denies the allegations in Paragraph 109.

110. The allegations in Paragraph 110 do not warrant a response in light of the Court's September 28, 2021 order granting United's Motion to Dismiss in part. To the extent any response is required, United denies the allegations in Paragraph 110.

111. The allegations in Paragraph 111 do not warrant a response in light of the Court's September 28, 2021 order granting United's Motion to Dismiss in part. To the extent any response is required, United denies the allegations in Paragraph 111.

112. The allegations in Paragraph 112 do not warrant a response in light of the Court's September 28, 2021 order granting United's Motion to Dismiss in part. To the extent any response is required, United denies the allegations in Paragraph 112.

113. The allegations in Paragraph 113 do not warrant a response in light of the Court's September 28, 2021 order granting United's Motion to Dismiss in part. To the extent any response is required, United denies the allegations in Paragraph 113.

114. The allegations in Paragraph 114 do not warrant a response in light of the Court's September 28, 2021 order granting United's Motion to Dismiss in part. To the extent any response is required, United denies the allegations in Paragraph 114.

115. The allegations in Paragraph 115 do not warrant a response in light of the Court's September 28, 2021 order granting United's Motion to Dismiss in part. To the extent any response is required, United denies the allegations in Paragraph 115.

116. The allegations in Paragraph 116 do not warrant a response in light of the Court's September 28, 2021 order granting United's Motion to Dismiss in part. To the extent any response is required, United denies the allegations in Paragraph 116.

117. The allegations in Paragraph 117 do not warrant a response in light of the Court's September 28, 2021 order granting United's Motion to Dismiss in part. To the extent any response is required, United denies the allegations in Paragraph 117.

118. The allegations in Paragraph 118 do not warrant a response in light of the Court's September 28, 2021 order granting United's Motion to Dismiss in part. To the extent any response is required, United denies the allegations in Paragraph 118.

119. The allegations in Paragraph 119 do not warrant a response in light of the Court's September 28, 2021 order granting United's Motion to Dismiss in part. To the extent any response is required, United denies the allegations in Paragraph 119.

120. The allegations in Paragraph 120 do not warrant a response in light of the Court's September 28, 2021 order granting United's Motion to Dismiss in part. To the extent any response

is required, United denies the allegations in Paragraph 120.

121. The allegations in Paragraph 121 do not warrant a response in light of the Court's September 28, 2021 order granting United's Motion to Dismiss in part. To the extent any response is required, United denies the allegations in Paragraph 121.

122. The allegations in Paragraph 122 do not warrant a response in light of the Court's September 28, 2021 order granting United's Motion to Dismiss in part. To the extent any response is required, United denies the allegations in Paragraph 122.

123. The allegations in Paragraph 123 do not warrant a response in light of the Court's September 28, 2021 order granting United's Motion to Dismiss in part. To the extent any response is required, United denies the allegations in Paragraph 123.

124. The allegations in Paragraph 124 do not warrant a response in light of the Court's September 28, 2021 order granting United's Motion to Dismiss in part. To the extent any response is required, United denies the allegations in Paragraph 124.

125. The allegations in Paragraph 125 do not warrant a response in light of the Court's September 28, 2021 order granting United's Motion to Dismiss in part. To the extent any response is required, United denies the allegations in Paragraph 125.

126. The allegations in Paragraph 126 do not warrant a response in light of the Court's September 28, 2021 order granting United's Motion to Dismiss in part. To the extent any response is required, United denies the allegations in Paragraph 126.

127. The allegations in Paragraph 127 do not warrant a response in light of the Court's September 28, 2021 order granting United's Motion to Dismiss in part. To the extent any response is required, United denies the allegations in Paragraph 127.

128. The allegations in Paragraph 128 do not warrant a response in light of the Court's



September 28, 2021 order granting United's Motion to Dismiss in part. To the extent any response is required, United denies the allegations in Paragraph 128.

129. The allegations in Paragraph 129 do not warrant a response in light of the Court's September 28, 2021 order granting United's Motion to Dismiss in part. To the extent any response is required, United denies the allegations in Paragraph 129.

130. The allegations in Paragraph 130 do not warrant a response in light of the Court's September 28, 2021 order granting United's Motion to Dismiss in part. To the extent any response is required, United denies the allegations in Paragraph 130.

131. United lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 131, and on that basis, denies them. To the extent any further response is required, United denies the allegations in Paragraph 131.

132. United lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 132, and on that basis, denies them.

133. United admits that the FAIR Health website contains a statement containing the language quoted in Paragraph 133. United lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 133, and on that basis, denies them.

134. United lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 134, and on that basis, denies them.

135. United denies the allegations in Paragraph 135.

136. United admits that Judge Alan D. Scheinkman issued an opinion in *UnitedHealthcare Services, Inc. v. Asprinio* that contains the language quoted in Paragraph 136. United responds that the opinion speaks for itself. To the extent any further response is required, United denies the allegations in Paragraph 136.

137. United responds that the terms of the agreement to which the allegations in Paragraph 137 refer speak for themselves. To the extent any further response is required, United denies the allegations in Paragraph 137.

138. United denies the allegations in Paragraph 138.

139. United denies the allegations in Paragraph 139.

140. United denies that the referenced link contains the cited statement in Paragraph 140. United admits that some United subsidiaries reference FAIR Health rates when they pay certain out-of-network claims under some healthcare plans.

141. United admits that some United subsidiaries reference FAIR Health rates when they pay certain out-of-network claims under some healthcare plans. United otherwise denies the allegations in Paragraph 141.

142. United lacks knowledge or information sufficient to form a belief as to the truth of the allegations in the first sentence of Paragraph 142, and on that basis, denies them. The remaining allegations of Paragraph 142 set forth legal conclusions to which no response is required.

143. Paragraph 143 sets forth legal conclusions that require no response.

144. United lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 144, and on that basis, denies them.

145. The allegations in Paragraph 145 are too vague and ambiguous to permit a response, and on that basis, United denies them.

146. United lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 146, and on that basis, denies them.

147. United lacks knowledge or information sufficient to form a belief as to the truth of

the allegations in Paragraph 147, and on that basis, denies them.

148. United denies the allegations in Paragraph 148.

149. United denies the allegations in Paragraph 149.

150. United denies the allegations in Paragraph 150.

151. United lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 151, and on that basis, denies them.

152. United responds that the contents of the website multiplan.us speak for themselves.

153. United lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 153, and on that basis, denies them.

154. United lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 154, and on that basis, denies them.

155. United lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 155, and on that basis, denies them.

156. United admits that some United subsidiaries send certain claims to MultiPlan so that MultiPlan can assist with pricing the claims. United denies that the flowchart provided accurately summarizes the manner in which all claims United subsidiaries send to MultiPlan are processed, and on that basis it denies the remaining allegations in Paragraph 156.

157. On information and belief, United admits that MultiPlan's Data iSight tool makes pricing recommendations for professional claims based on a number of factors. United denies the remaining allegations in Paragraph 157.

158. United denies the allegations in Paragraph 158.

159. United denies the allegations in Paragraph 159.

160. United denies the allegations in Paragraph 160.

161. United admits that Plaintiffs purport to seek monetary and injunctive relief, but denies that Plaintiffs are entitled to any relief. United denies any remaining allegations in Paragraph 161.

162. United lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 162, and on that basis, denies them.

163. United lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 163, and on that basis, denies them.

164. United lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 164, and on that basis, denies them.

165. United lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 165, and on that basis, denies them.

166. United lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 166, and on that basis, denies them.

167. United admits that several of the Plaintiffs submitted numerous claims to some United subsidiaries. United lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 167 and, on that basis, denies them.

168. United lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 168, and on that basis, denies them.

169. United lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 169, and on that basis, denies them.

170. United denies the allegations in Paragraph 170.

171. United admits that some United subsidiaries contract with Multiplan. United denies the remaining allegations in Paragraph 171.

172. United responds that the terms and conditions of member benefit plans speak for themselves.

173. Paragraph 173 sets forth legal conclusions to which to response is required. To the extent any further response is required, United responds that the terms and conditions of member benefit plans speak for themselves.

174. United admits that some United subsidiaries contract with Multiplan. On information and belief, United admits that MultiPlan's Data iSight tool makes pricing recommendations for professional claims based on a number of factors. United denies the remaining allegations in Paragraph 174.

175. United lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 175, and on that basis, denies them.

176. United lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 176, and on that basis, denies them.

177. United admits that the services identified in Paragraph 177 are among the services that MultiPlan generally offers, including to some United subsidiaries.

178. United denies that it underpaid claims. United lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 178, and on that basis, denies them.

179. United denies the allegations in Paragraph 179.

180. United admits that Plaintiffs purport to describe the Data iSight product. United denies that Plaintiffs' "high-level overview" of the Data iSight product is accurate.

181. On information and belief, United admits that MultiPlan's Data iSight tool makes pricing recommendations for professional claims based on a number of factors. United denies the

remaining allegations in Paragraph 181.

182. United admits that some United subsidiaries send some claims to MultiPlan. United denies the remaining allegations in Paragraph 182.

183. United admits that some United subsidiaries send claim information for some claims to MultiPlan via an electronic data interchange program. United further admits the allegations in Subparagraphs A and B of Paragraph 183. United denies the allegations in Subparagraphs C and D of Paragraph 183. United denies the remaining allegations in Paragraph 183.

184. United lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 184, and on that basis, denies them.

185. United lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 185, and on that basis, denies them.

186. United lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 186, and on that basis, denies them.

187. United lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 187, and on that basis, denies them.

188. United admits that professional claims are distinct from hospital or facility claims. United lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 188, and on that basis, denies them.

189. United lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 189, and on that basis, denies them.

190. United lacks knowledge or information sufficient to form a belief as to the truth of the allegations regarding the granular and precise mechanical details of the proprietary Data iSight

methodology in Paragraph 190, and on that basis, denies them.

191. The phrase “different aspects of the claims editing” is too vague and ambiguous to permit a response, and on that basis, United denies the allegations in Paragraph 191.

192. United lacks knowledge or information sufficient to form a belief as to the truth of the allegations regarding the granular and precise mechanical details of the proprietary Data iSight methodology in Paragraph 190, and on that basis, denies them.

193. United lacks knowledge or information sufficient to form a belief as to the truth of the allegations regarding the granular and precise mechanical details of the proprietary Data iSight methodology in Paragraph 193, and on that basis, denies them.

194. United admits the allegations in the second sentence of Paragraph 194. United denies the remaining allegations in Paragraph 194.

195. United lacks knowledge or information sufficient to form a belief as to the truth of the allegations regarding the granular and precise mechanical details of the proprietary Data iSight methodology in Paragraph 195, and on that basis, denies them.

196. United denies the allegations in Paragraph 196.

197. The allegations in Paragraph 197 are too vague and ambiguous to permit a response, and on that basis, United denies them.

198. United lacks knowledge or information sufficient to form a belief as to the truth of the allegations regarding the granular and precise mechanical details of the proprietary Data iSight methodology in Paragraph 198, and on that basis, denies them.

199. United lacks knowledge or information sufficient to form a belief as to the truth of the allegations regarding the granular and precise mechanical details of the proprietary Data iSight methodology in Paragraph 198, and on that basis, denies them.

200. United lacks knowledge or information sufficient to form a belief as to the truth of the allegations regarding the granular and precise mechanical details of the proprietary Data iSight methodology in Paragraph 200, and on that basis, denies them.

201. United lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 201, and on that basis, denies them.

202. United admits that Intercontinental Medical Statistics is now known as IQVIA and that the IQVIA database is not open to the general public. United lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 202, and on that basis, denies them.

203. United denies the allegations in Paragraph 203.

204. United admits that the IQVIA database is not open to the general public. United denies that any United subsidiary contracted with MultiPlan because the IQVIA database is opaque or subject to manipulation. United lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 204, and on that basis, denies them.

205. United lacks knowledge or information sufficient to form a belief as to the truth of the allegations in regarding why MultiPlan chose IMS/IQVIA, and on that basis, denies them. United denies the remaining allegations in Paragraph 205.

206. United denies the allegations in Paragraph 206.

207. United denies the allegations in Paragraph 207.

208. United denies the allegations in Paragraph 208.

209. United lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 209, and on that basis, denies them.

210. United admits that Medicare uses RVUs and GPCIs to calculate Medicare payment



rates. United lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 204, and on that basis, denies them.

211. United lacks knowledge or information sufficient to form a belief as to the allegations in Paragraph 211, and on that basis, denies them.

212. United denies the allegations in Paragraph 212.

213. United denies the allegations in Paragraph 213.

214. United denies the allegations in Paragraph 214.

215. United denies the allegations in Paragraph 215.

216. United denies the allegations in Paragraph 216.

217. United denies the allegations in Paragraph 217.

218. United denies the allegations in Paragraph 218.

219. United denies the allegations in Paragraph 219.

220. United denies the allegations in Paragraph 220.

221. United denies the allegations in Paragraph 221.

222. The allegations in Paragraph 222 do not warrant a response in light of the Court's September 28, 2021 order granting United's Motion to Dismiss in part. To the extent any response is required, United denies the allegations in Paragraph 222.

223. The allegations in Paragraph 223 do not warrant a response in light of the Court's September 28, 2021 order granting United's Motion to Dismiss in part. To the extent any response is required, United denies the allegations in Paragraph 223.

224. The allegations in Paragraph 224 do not warrant a response in light of the Court's September 28, 2021 order granting United's Motion to Dismiss in part. To the extent any response is required, United denies the allegations in Paragraph 224.

225. The allegations in Paragraph 225 do not warrant a response in light of the Court's September 28, 2021 order granting United's Motion to Dismiss in part. To the extent any response is required, United denies the allegations in Paragraph 225.

226. The allegations in Paragraph 226 do not warrant a response in light of the Court's September 28, 2021 order granting United's Motion to Dismiss in part. To the extent any response is required, United denies the allegations in Paragraph 226.

227. The allegations in Paragraph 227 do not warrant a response in light of the Court's September 28, 2021 order granting United's Motion to Dismiss in part. To the extent any response is required, United denies the allegations in Paragraph 227.

228. The allegations in Paragraph 228 do not warrant a response in light of the Court's September 28, 2021 order granting United's Motion to Dismiss in part. To the extent any response is required, United denies the allegations in Paragraph 228.

229. The allegations in Paragraph 229 do not warrant a response in light of the Court's September 28, 2021 order granting United's Motion to Dismiss in part. To the extent any response is required, United denies the allegations in Paragraph 229.

230. The allegations in Paragraph 230 do not warrant a response in light of the Court's September 28, 2021 order granting United's Motion to Dismiss in part. To the extent any response is required, United denies the allegations in Paragraph 230.

231. The allegations in Paragraph 231 do not warrant a response in light of the Court's September 28, 2021 order granting United's Motion to Dismiss in part. To the extent any response is required, United denies the allegations in Paragraph 231.

232. The allegations in Paragraph 232 do not warrant a response in light of the Court's September 28, 2021 order granting United's Motion to Dismiss in part. To the extent any response

is required, United denies the allegations in Paragraph 232.

233. The allegations in Paragraph 233 do not warrant a response in light of the Court's September 28, 2021 order granting United's Motion to Dismiss in part. To the extent any response is required, United denies the allegations in Paragraph 233.

234. The allegations in Paragraph 234 do not warrant a response in light of the Court's September 28, 2021 order granting United's Motion to Dismiss in part. To the extent any response is required, United denies the allegations in Paragraph 234.

235. The allegations in Paragraph 235 do not warrant a response in light of the Court's September 28, 2021 order granting United's Motion to Dismiss in part. To the extent any response is required, United denies the allegations in Paragraph 235.

236. The allegations in Paragraph 236 do not warrant a response in light of the Court's September 28, 2021 order granting United's Motion to Dismiss in part. To the extent any response is required, United denies the allegations in Paragraph 236.

237. The allegations in Paragraph 237 do not warrant a response in light of the Court's September 28, 2021 order granting United's Motion to Dismiss in part. To the extent any response is required, United denies the allegations in Paragraph 237.

238. The allegations in Paragraph 238 do not warrant a response in light of the Court's September 28, 2021 order granting United's Motion to Dismiss in part. To the extent any response is required, United denies the allegations in Paragraph 238.

239. The allegations in Paragraph 239 do not warrant a response in light of the Court's September 28, 2021 order granting United's Motion to Dismiss in part. To the extent any response is required, United denies the allegations in Paragraph 239.

240. The allegations in Paragraph 240 do not warrant a response in light of the Court's

September 28, 2021 order granting United's Motion to Dismiss in part. To the extent any response is required, United denies the allegations in Paragraph 240.

241. The allegations in Paragraph 241 do not warrant a response in light of the Court's September 28, 2021 order granting United's Motion to Dismiss in part. To the extent any response is required, United denies the allegations in Paragraph 241.

242. The allegations in Paragraph 242 do not warrant a response in light of the Court's September 28, 2021 order granting United's Motion to Dismiss in part. To the extent any response is required, United denies the allegations in Paragraph 242.

243. The allegations in Paragraph 243 do not warrant a response in light of the Court's September 28, 2021 order granting United's Motion to Dismiss in part. To the extent any response is required, United denies the allegations in Paragraph 243.

244. The allegations in Paragraph 244 do not warrant a response in light of the Court's September 28, 2021 order granting United's Motion to Dismiss in part. To the extent any response is required, United denies the allegations in Paragraph 244.

245. The allegations in Paragraph 245. do not warrant a response in light of the Court's September 28, 2021 order granting United's Motion to Dismiss in part. To the extent any response is required, United denies the allegations in Paragraph 245.

246. The allegations in Paragraph 246 do not warrant a response in light of the Court's September 28, 2021 order granting United's Motion to Dismiss in part. To the extent any response is required, United denies the allegations in Paragraph 246.

247. The allegations in Paragraph 247 do not warrant a response in light of the Court's September 28, 2021 order granting United's Motion to Dismiss in part.

248. The allegations in Paragraph 248 do not warrant a response in light of the Court's

September 28, 2021 order granting United's Motion to Dismiss in part.

249. The allegations in Paragraph 249 do not warrant a response in light of the Court's September 28, 2021 order granting United's Motion to Dismiss in part. To the extent any response is required, United denies the allegations in Paragraph 249.

250. The allegations in Paragraph 250 do not warrant a response in light of the Court's September 28, 2021 order granting United's Motion to Dismiss in part. To the extent any response is required, United denies the allegations in Paragraph 250.

251. The allegations in Paragraph 251 do not warrant a response in light of the Court's September 28, 2021 order granting United's Motion to Dismiss in part. To the extent any response is required, United denies the allegations in Paragraph 251.

252. The allegations in Paragraph 252 do not warrant a response in light of the Court's September 28, 2021 order granting United's Motion to Dismiss in part. To the extent any response is required, United denies the allegations in Paragraph 252.

253. The allegations in Paragraph 253 do not warrant a response in light of the Court's September 28, 2021 order granting United's Motion to Dismiss in part. To the extent any response is required, United denies the allegations in Paragraph 253.

254. The allegations in Paragraph 254 do not warrant a response in light of the Court's September 28, 2021 order granting United's Motion to Dismiss in part. To the extent any response is required, United denies the allegations in Paragraph 254.

255. The allegations in Paragraph 255 do not warrant a response in light of the Court's September 28, 2021 order granting United's Motion to Dismiss in part. To the extent any response is required, United denies the allegations in Paragraph 255.

256. The allegations in Paragraph 256 do not warrant a response in light of the Court's

September 28, 2021 order granting United's Motion to Dismiss in part. To the extent any response is required, United denies the allegations in Paragraph 256.

257. The allegations in Paragraph 257 do not warrant a response in light of the Court's September 28, 2021 order granting United's Motion to Dismiss in part. To the extent any response is required, United denies the allegations in Paragraph 257.

258. The allegations in Paragraph 258 do not warrant a response in light of the Court's September 28, 2021 order granting United's Motion to Dismiss in part. To the extent any response is required, United denies the allegations in Paragraph 258.

259. The allegations in Paragraph 259 do not warrant a response in light of the Court's September 28, 2021 order granting United's Motion to Dismiss in part. To the extent any response is required, United denies the allegations in Paragraph 259.

260. The allegations in Paragraph 260 do not warrant a response in light of the Court's September 28, 2021 order granting United's Motion to Dismiss in part. To the extent any response is required, United denies the allegations in Paragraph 260.

261. The allegations in Paragraph 261 do not warrant a response in light of the Court's September 28, 2021 order granting United's Motion to Dismiss in part. To the extent any response is required, United denies the allegations in Paragraph 261.

262. The allegations in Paragraph 262 do not warrant a response in light of the Court's September 28, 2021 order granting United's Motion to Dismiss in part.

263. The allegations in Paragraph 263 do not warrant a response in light of the Court's September 28, 2021 order granting United's Motion to Dismiss in part. .

264. The allegations in Paragraph 264 do not warrant a response in light of the Court's September 28, 2021 order granting United's Motion to Dismiss in part. To the extent any response

is required, United denies the allegations in Paragraph 264.

265. The allegations in Paragraph 265 do not warrant a response in light of the Court's September 28, 2021 order granting United's Motion to Dismiss in part. To the extent any response is required, United denies the allegations in Paragraph 265.

266. The allegations in Paragraph 266 do not warrant a response in light of the Court's September 28, 2021 order granting United's Motion to Dismiss in part. To the extent any response is required, United denies the allegations in Paragraph 266.

267. The allegations in Paragraph 267 do not warrant a response in light of the Court's September 28, 2021 order granting United's Motion to Dismiss in part. To the extent any response is required, United denies the allegations in Paragraph 267.

268. The allegations in Paragraph 268 do not warrant a response in light of the Court's September 28, 2021 order granting United's Motion to Dismiss in part. To the extent any response is required, United denies the allegations in Paragraph 268.

269. The allegations in Paragraph 269 do not warrant a response in light of the Court's September 28, 2021 order granting United's Motion to Dismiss in part. To the extent any response is required, United denies the allegations in Paragraph 269.

270. The allegations in Paragraph 270 do not warrant a response in light of the Court's September 28, 2021 order granting United's Motion to Dismiss in part.

271. The allegations in Paragraph 271 do not warrant a response in light of the Court's September 28, 2021 order granting United's Motion to Dismiss in part. To the extent any response is required, United denies the allegations in Paragraph 271.

272. The allegations in Paragraph 122 do not warrant a response in light of the Court's September 28, 2021 order granting United's Motion to Dismiss in part. To the extent any response

is required, United denies the allegations in Paragraph 272.

273. The allegations in Paragraph 273 do not warrant a response in light of the Court's September 28, 2021 order granting United's Motion to Dismiss in part. To the extent any response is required, United denies the allegations in Paragraph 273.

274. The allegations in Paragraph 274 do not warrant a response in light of the Court's September 28, 2021 order granting United's Motion to Dismiss in part.

275. The allegations in Paragraph 275 do not warrant a response in light of the Court's September 28, 2021 order granting United's Motion to Dismiss in part. To the extent any response is required, United denies the allegations in Paragraph 275.

276. The allegations in Paragraph 276 do not warrant a response in light of the Court's September 28, 2021 order granting United's Motion to Dismiss in part. To the extent any response is required, United denies the allegations in Paragraph 276.

277. The allegations in Paragraph 277 do not warrant a response in light of the Court's September 28, 2021 order granting United's Motion to Dismiss in part. To the extent any response is required, United denies the allegations in Paragraph 277.

278. The allegations in Paragraph 278 do not warrant a response in light of the Court's September 28, 2021 order granting United's Motion to Dismiss in part. To the extent any response is required, United denies the allegations in Paragraph 278.

279. The allegations in Paragraph 279 do not warrant a response in light of the Court's September 28, 2021 order granting United's Motion to Dismiss in part. To the extent any response is required, United denies the allegations in Paragraph 279.

280. The allegations in Paragraph 280 do not warrant a response in light of the Court's September 28, 2021 order granting United's Motion to Dismiss in part. To the extent any response



is required, United denies the allegations in Paragraph 280.

281. The allegations in Paragraph 281 do not warrant a response in light of the Court's September 28, 2021 order granting United's Motion to Dismiss in part. To the extent any response is required, United denies the allegations in Paragraph 281.

282. The allegations in Paragraph 282 do not warrant a response in light of the Court's September 28, 2021 order granting United's Motion to Dismiss in part. To the extent any response is required, United denies the allegations in Paragraph 282.

283. The allegations in Paragraph 283 do not warrant a response in light of the Court's September 28, 2021 order granting United's Motion to Dismiss in part.

284. The allegations in Paragraph 284 do not warrant a response in light of the Court's September 28, 2021 order granting United's Motion to Dismiss in part. To the extent any response is required, United denies the allegations in Paragraph 284.

285. The allegations in Paragraph 285 do not warrant a response in light of the Court's September 28, 2021 order granting United's Motion to Dismiss in part.

286. The allegations in Paragraph 286 do not warrant a response in light of the Court's September 28, 2021 order granting United's Motion to Dismiss in part. To the extent any response is required, United denies the allegations in Paragraph 286.

287. The allegations in Paragraph 287 do not warrant a response in light of the Court's September 28, 2021 order granting United's Motion to Dismiss in part. To the extent any response is required, United denies the allegations in Paragraph 287.

288. The allegations in Paragraph 288 do not warrant a response in light of the Court's September 28, 2021 order granting United's Motion to Dismiss in part. To the extent any response is required, United denies the allegations in Paragraph 288.

289. The allegations in Paragraph 289 do not warrant a response in light of the Court's September 28, 2021 order granting United's Motion to Dismiss in part. To the extent any response is required, United denies the allegations in Paragraph 289.

290. The allegations in Paragraph 290 do not warrant a response in light of the Court's September 28, 2021 order granting United's Motion to Dismiss in part. To the extent any response is required, United denies the allegations in Paragraph 290.

291. The allegations in Paragraph 291 do not warrant a response in light of the Court's September 28, 2021 order granting United's Motion to Dismiss in part. To the extent any response is required, United denies the allegations in Paragraph 291.

292. The allegations in Paragraph 292 do not warrant a response in light of the Court's September 28, 2021 order granting United's Motion to Dismiss in part. To the extent any response is required, United denies the allegations in Paragraph 292.

293. The allegations in Paragraph 293 do not warrant a response in light of the Court's September 28, 2021 order granting United's Motion to Dismiss in part.

294. The allegations in Paragraph 294 do not warrant a response in light of the Court's September 28, 2021 order granting United's Motion to Dismiss in part. To the extent any response is required, United denies the allegations in Paragraph 294.

295. The allegations in Paragraph 295 do not warrant a response in light of the Court's September 28, 2021 order granting United's Motion to Dismiss in part. To the extent any response is required, United denies the allegations in Paragraph 295.

296. The allegations in Paragraph 296 do not warrant a response in light of the Court's September 28, 2021 order granting United's Motion to Dismiss in part. To the extent any response is required, United denies the allegations in Paragraph 296.

297. The allegations in Paragraph 297 do not warrant a response in light of the Court's September 28, 2021 order granting United's Motion to Dismiss in part. To the extent any response is required, United denies the allegations in Paragraph 297.

298. The allegations in Paragraph 298 do not warrant a response in light of the Court's September 28, 2021 order granting United's Motion to Dismiss in part. To the extent any response is required, United denies the allegations in Paragraph 298.

299. The allegations in Paragraph 299 do not warrant a response in light of the Court's September 28, 2021 order granting United's Motion to Dismiss in part. To the extent any response is required, United denies the allegations in Paragraph 299.

300. The allegations in Paragraph 300 do not warrant a response in light of the Court's September 28, 2021 order granting United's Motion to Dismiss in part. To the extent any response is required, United denies the allegations in Paragraph 300.

301. The allegations in Paragraph 301 do not warrant a response in light of the Court's September 28, 2021 order granting United's Motion to Dismiss in part. To the extent any response is required, United denies the allegations in Paragraph 301.

302. The allegations in Paragraph 302 do not warrant a response in light of the Court's September 28, 2021 order granting United's Motion to Dismiss in part. To the extent any response is required, United denies the allegations in Paragraph 302.

303. The allegations in Paragraph 303 do not warrant a response in light of the Court's September 28, 2021 order granting United's Motion to Dismiss in part. To the extent any response is required, United denies the allegations in Paragraph 303.

304. The allegations in Paragraph 304 do not warrant a response in light of the Court's September 28, 2021 order granting United's Motion to Dismiss in part. To the extent any response

is required, United denies the allegations in Paragraph 304.

305. The allegations in Paragraph 305 do not warrant a response in light of the Court's September 28, 2021 order granting United's Motion to Dismiss in part. To the extent any response is required, United denies the allegations in Paragraph 305.

306. The allegations in Paragraph 306 do not warrant a response in light of the Court's September 28, 2021 order granting United's Motion to Dismiss in part. To the extent any response is required, United denies the allegations in Paragraph 306.

307. The allegations in Paragraph 307 do not warrant a response in light of the Court's September 28, 2021 order granting United's Motion to Dismiss in part. To the extent any response is required, United denies the allegations in Paragraph 307.

308. The allegations in Paragraph 308 do not warrant a response in light of the Court's September 28, 2021 order granting United's Motion to Dismiss in part. To the extent any response is required, United denies the allegations in Paragraph 308.

309. The allegations in Paragraph 309 do not warrant a response in light of the Court's September 28, 2021 order granting United's Motion to Dismiss in part. To the extent any response is required, United denies the allegations in Paragraph 309.

310. The allegations in Paragraph 310 do not warrant a response in light of the Court's September 28, 2021 order granting United's Motion to Dismiss in part. To the extent any response is required, United denies the allegations in Paragraph 310.

311. The allegations in Paragraph 311 do not warrant a response in light of the Court's September 28, 2021 order granting United's Motion to Dismiss in part. To the extent any response is required, United denies the allegations in Paragraph 311.

312. The allegations in Paragraph 312 do not warrant a response in light of the Court's

September 28, 2021 order granting United's Motion to Dismiss in part. To the extent any response is required, United denies the allegations in Paragraph 312.

313. The allegations in Paragraph 313 do not warrant a response in light of the Court's September 28, 2021 order granting United's Motion to Dismiss in part. To the extent any response is required, United denies the allegations in Paragraph 313.

314. The allegations in Paragraph 314 do not warrant a response in light of the Court's September 28, 2021 order granting United's Motion to Dismiss in part. To the extent any response is required, United denies the allegations in Paragraph 314.

315. The allegations in Paragraph 315 do not warrant a response in light of the Court's September 28, 2021 order granting United's Motion to Dismiss in part.

316. The allegations in Paragraph 316 do not warrant a response in light of the Court's September 28, 2021 order granting United's Motion to Dismiss in part. To the extent any response is required, United denies the allegations in Paragraph 316.

317. The allegations in Paragraph 317 do not warrant a response in light of the Court's September 28, 2021 order granting United's Motion to Dismiss in part. To the extent any response is required, United denies the allegations in Paragraph 317.

318. The allegations in Paragraph 318 do not warrant a response in light of the Court's September 28, 2021 order granting United's Motion to Dismiss in part. To the extent any response is required, United denies the allegations in Paragraph 318.

319. The allegations in Paragraph 319 do not warrant a response in light of the Court's September 28, 2021 order granting United's Motion to Dismiss in part.

320. The allegations in Paragraph 320 do not warrant a response in light of the Court's September 28, 2021 order granting United's Motion to Dismiss in part. To the extent any response

is required, United denies the allegations in Paragraph 320.

321. The allegations in Paragraph 321 do not warrant a response in light of the Court's September 28, 2021 order granting United's Motion to Dismiss in part. To the extent any response is required, United denies the allegations in Paragraph 321.

322. The allegations in Paragraph 322 do not warrant a response in light of the Court's September 28, 2021 order granting United's Motion to Dismiss in part. To the extent any response is required, United denies the allegations in Paragraph 322.

323. The allegations in Paragraph 323 do not warrant a response in light of the Court's September 28, 2021 order granting United's Motion to Dismiss in part. To the extent any response is required, United denies the allegations in Paragraph 323.

324. The allegations in Paragraph 324 do not warrant a response in light of the Court's September 28, 2021 order granting United's Motion to Dismiss in part. To the extent any response is required, United denies the allegations in Paragraph 324.

325. The allegations in Paragraph 325 do not warrant a response in light of the Court's September 28, 2021 order granting United's Motion to Dismiss in part. To the extent any response is required, United denies the allegations in Paragraph 325.

326. The allegations in Paragraph 326 do not warrant a response in light of the Court's September 28, 2021 order granting United's Motion to Dismiss in part. To the extent any response is required, United denies the allegations in Paragraph 326.

327. The allegations in Paragraph 327 do not warrant a response in light of the Court's September 28, 2021 order granting United's Motion to Dismiss in part. To the extent any response is required, United denies the allegations in Paragraph 327.

328. The allegations in Paragraph 328 do not warrant a response in light of the Court's

September 28, 2021 order granting United's Motion to Dismiss in part. To the extent any response is required, United denies the allegations in Paragraph 328.

329. The allegations in Paragraph 329 do not warrant a response in light of the Court's September 28, 2021 order granting United's Motion to Dismiss in part. To the extent any response is required, United denies the allegations in Paragraph 329.

330. The allegations in Paragraph 330 do not warrant a response in light of the Court's September 28, 2021 order granting United's Motion to Dismiss in part. To the extent any response is required, United denies the allegations in Paragraph 330.

331. The allegations in Paragraph 331 do not warrant a response in light of the Court's September 28, 2021 order granting United's Motion to Dismiss in part. To the extent any response is required, United denies the allegations in Paragraph 331.

332. The allegations in Paragraph 332 do not warrant a response in light of the Court's September 28, 2021 order granting United's Motion to Dismiss in part. To the extent any response is required, United denies the allegations in Paragraph 332.

333. The allegations in Paragraph 333 do not warrant a response in light of the Court's September 28, 2021 order granting United's Motion to Dismiss in part. To the extent any response is required, United denies the allegations in Paragraph 333.

334. The allegations in Paragraph 334 do not warrant a response in light of the Court's September 28, 2021 order granting United's Motion to Dismiss in part. To the extent any response is required, United denies the allegations in Paragraph 334.

335. The allegations in Paragraph 335 do not warrant a response in light of the Court's September 28, 2021 order granting United's Motion to Dismiss in part. To the extent any response is required, United denies the allegations in Paragraph 335.

336. The allegations in Paragraph 336 do not warrant a response in light of the Court's September 28, 2021 order granting United's Motion to Dismiss in part. To the extent any response is required, United denies the allegations in Paragraph 336.

337. The allegations in Paragraph 337 do not warrant a response in light of the Court's September 28, 2021 order granting United's Motion to Dismiss in part. To the extent any response is required, United denies the allegations in Paragraph 337.

338. The allegations in Paragraph 338 do not warrant a response in light of the Court's September 28, 2021 order granting United's Motion to Dismiss in part. To the extent any response is required, United denies the allegations in Paragraph 338.

339. The allegations in Paragraph 339 do not warrant a response in light of the Court's September 28, 2021 order granting United's Motion to Dismiss in part. To the extent any response is required, United denies the allegations in Paragraph 339.

340. The allegations in Paragraph 340 do not warrant a response in light of the Court's September 28, 2021 order granting United's Motion to Dismiss in part. To the extent any response is required, United denies the allegations in Paragraph 340.

341. The allegations in Paragraph 341 do not warrant a response in light of the Court's September 28, 2021 order granting United's Motion to Dismiss in part. To the extent any response is required, United denies the allegations in Paragraph 341.

342. The allegations in Paragraph 342 do not warrant a response in light of the Court's September 28, 2021 order granting United's Motion to Dismiss in part. To the extent any response is required, United denies the allegations in Paragraph 342.

343. United admits that representatives of one or more United entities in 2017, 2018, and 2019 met with various individual who purported to represent TeamHealth entities, including



the Plaintiffs, to negotiate contracts for TeamHealth affiliated entities to become participating, in-network providers. United lacks knowledge or information sufficient to form a belief as to the remaining allegations in Paragraph 343, and on that basis, denies them.

344. United admits that the meetings referenced in Paragraph 344 occurred in person, by phone, and by email correspondence.

345. United admits the allegations in Paragraph 345 except that United lacks knowledge or information sufficient to form a belief as to the truth of the allegation that individuals or entities that “met” with United are properly characterized as “Plaintiffs’ representatives,” and on that basis, denies the allegation.

346. United admits that representatives of United entities discussed benchmark pricing with TeamHealth representatives in the course of their negotiations, but denies the remaining allegations in Paragraph 346.

347. United denies the allegations in Paragraph 347.

348. United denies the allegations in Paragraph 348.

349. United admits that Plaintiffs rejected United’s proposed rates. United denies the remaining allegations in Paragraph 349.

350. United lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 350 and on that basis, denies them. To the extent any further response is required, United denies the allegations in Paragraph 350.

351. United denies the allegations in Paragraph 351.

352. United lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 352 and on that basis, denies them. To the extent any further response is required, United denies the allegations in Paragraph 352.

353. United denies the allegations in Paragraph 353.

354. The allegations in Paragraph 354 do not warrant a response in light of the Court's September 28, 2021 order granting United's Motion to Dismiss in part. To the extent any response is required, United denies the allegations in Paragraph 354.

355. United denies the allegations in Paragraph 355.

356. United denies the allegation in Paragraph 356.

357. United admits that Angie Nierman sent a written proposal to a TeamHealth representative in July 2019. United denies the remaining allegations in Paragraph 357.

358. The allegations in Paragraph 358 do not warrant a response in light of the Court's September 28, 2021 order granting United's Motion to Dismiss in part. To the extent any response is required, United denies the allegations in Paragraph 358.

359. The allegations in Paragraph 359 do not warrant a response in light of the Court's September 28, 2021 order granting United's Motion to Dismiss in part. To the extent any response is required, United denies the allegations in Paragraph 359.

360. The allegations in Paragraph 360 do not warrant a response in light of the Court's September 28, 2021 order granting United's Motion to Dismiss in part. To the extent any response is required, United denies the allegations in Paragraph 360.

361. United lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 361 and on that basis, denies them.

362. United lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 362 and on that basis, denies them.

363. The allegations in Paragraph 363 do not warrant a response in light of the Court's September 28, 2021 order granting United's Motion to Dismiss in part. To the extent any response

is required, United denies the allegations in Paragraph 363.

364. The allegations in Paragraph 364 do not warrant a response in light of the Court's September 28, 2021 order granting United's Motion to Dismiss in part. To the extent any response is required, United denies the allegations in Paragraph 364.

365. Plaintiffs have characterized the allegations in Paragraph 365 as a "Predicate Act" in support of Counts I and II of the Complaint. However, because the Court's September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, United denies the allegations in Paragraph 365.

366. Plaintiffs have characterized the allegations in Paragraph 366 as a "Predicate Act" in support of Counts I and II of the Complaint. However, because the Court's September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, and because the allegations in Paragraph 366 concern specific claims, but fail to provide necessary claims-identifying information, United lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 366, and, on that basis, denies them.

367. Plaintiffs have characterized the allegations in Paragraph 367 as a "Predicate Act" in support of Counts I and II of the Complaint. However, because the Court's September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, and because the allegations in Paragraph 367 concern specific claims, but fail to provide necessary claims-identifying information, United lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 367, and, on that basis, denies them.

368. Plaintiffs have characterized the allegations in Paragraph 368 as a "Predicate Act"

in support of Counts I and II of the Complaint. However, because the Court's September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, and because the allegations in Paragraph 368 concern specific claims, but fail to provide necessary claims-identifying information, United lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 368, and, on that basis, denies them.

369. Plaintiffs have characterized the allegations in Paragraph 369 as a "Predicate Act" in support of Counts I and II of the Complaint. However, because the Court's September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, and because the allegations in Paragraph 369 concern specific claims, but fail to provide necessary claims-identifying information, United lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 369, and, on that basis, denies them.

370. Plaintiffs have characterized the allegations in Paragraph 370 as a "Predicate Act" in support of Counts I and II of the Complaint. However, because the Court's September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, and because the allegations in Paragraph 370 concern specific claims, but fail to provide necessary claims-identifying information, United lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 370, and, on that basis, denies them.

371. Plaintiffs have characterized the allegations in Paragraph 371 as a "Predicate Act" in support of Counts I and II of the Complaint. However, because the Court's September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a

response is required, and because the allegations in Paragraph 371 concern specific claims, but fail to provide necessary claims-identifying information, United lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 371, and, on that basis, denies them.

372. Plaintiffs have characterized the allegations in Paragraph 372 as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, and because the allegations in Paragraph 372 concern specific claims, but fail to provide necessary claims-identifying information, United lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 372, and, on that basis, denies them.

373. Plaintiffs have characterized the allegations in Paragraph 373 as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, and because the allegations in Paragraph 373 concern specific claims, but fail to provide necessary claims-identifying information, United lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 373, and, on that basis, denies them.

374. Plaintiffs have characterized the allegations in Paragraph 374 as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, and because the allegations in Paragraph 374 concern specific claims, but fail to provide necessary claims-identifying information, United lacks knowledge or information

sufficient to form a belief as to the truth of the allegations in Paragraph 374, and, on that basis, denies them.

375. Plaintiffs have characterized the allegations in Paragraph 375 as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, United denies the allegations in Paragraph 375.

376. Plaintiffs have characterized the allegations in Paragraph 376 as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, United denies the allegations in Paragraph 376.

377. Plaintiffs have characterized the allegations in Paragraph 377 as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, United denies the allegations in Paragraph 377.

378. Plaintiffs have characterized the allegations in Paragraph 378 as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, United denies the allegations in Paragraph 378.

379. Plaintiffs have characterized the allegations in Paragraph 379 as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, United denies the allegations in Paragraph 379.

380. Plaintiffs have characterized the allegations in Paragraph 380 as a “Predicate Act”

in support of Counts I and II of the Complaint. However, because the Court's September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, and because the allegations in Paragraph 380 concern specific claims, but fail to provide necessary claims-identifying information, United lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 380, and, on that basis, denies them.

381. Plaintiffs have characterized the allegations in Paragraph 381 as a "Predicate Act" in support of Counts I and II of the Complaint. However, because the Court's September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, and because the allegations in Paragraph 381 concern specific claims, but fail to provide necessary claims-identifying information, United lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 381, and, on that basis, denies them.

382. Plaintiffs have characterized the allegations in Paragraph 382 as a "Predicate Act" in support of Counts I and II of the Complaint. However, because the Court's September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, and because the allegations in Paragraph 382 concern specific claims, but fail to provide necessary claims-identifying information, United lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 382, and, on that basis, denies them.

383. Plaintiffs have characterized the allegations in Paragraph 383 as a "Predicate Act" in support of Counts I and II of the Complaint. However, because the Court's September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a

response is required, and because the allegations in Paragraph 383 concern specific claims, but fail to provide necessary claims-identifying information, United lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 383, and, on that basis, denies them.

384. Plaintiffs have characterized the allegations in Paragraph 384 as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, and because the allegations in Paragraph 384 concern specific claims, but fail to provide necessary claims-identifying information, United lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 384, and, on that basis, denies them.

385. Plaintiffs have characterized the allegations in Paragraph 385 as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, and because the allegations in Paragraph 385 concern specific claims, but fail to provide necessary claims-identifying information, United lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 385, and, on that basis, denies them.

386. Plaintiffs have characterized the allegations in Paragraph 386 as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, and because the allegations in Paragraph 386 concern specific claims, but fail to provide necessary claims-identifying information, United lacks knowledge or information



sufficient to form a belief as to the truth of the allegations in Paragraph 386, and, on that basis, denies them.

387. Plaintiffs have characterized the allegations in Paragraph 387 as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, and because the allegations in Paragraph 387 concern specific claims, but fail to provide necessary claims-identifying information, United lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 387, and, on that basis, denies them.

388. Plaintiffs have characterized the allegations in Paragraph 388 as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, and because the allegations in Paragraph 388 concern specific claims, but fail to provide necessary claims-identifying information, United lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 388, and, on that basis, denies them.

389. Plaintiffs have characterized the allegations in Paragraph 389 as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, United denies the allegations in Paragraph 389.

390. Plaintiffs have characterized the allegations in Paragraph 390 as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a

response is required, United denies the allegations in Paragraph 390.

391. Plaintiffs have characterized the allegations in Paragraph 391 as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, United denies the allegations in Paragraph 391.

392. Plaintiffs have characterized the allegations in Paragraph 392 as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, United denies the allegations in Paragraph 392.

393. Plaintiffs have characterized the allegations in Paragraph 393 as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, United denies the allegations in Paragraph 393.

394. Plaintiffs have characterized the allegations in Paragraph 394 as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, and because the allegations in Paragraph 394 concern specific claims, but fail to provide necessary claims-identifying information, United lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 394, and, on that basis, denies them.

395. Plaintiffs have characterized the allegations in Paragraph 395 as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a

response is required, and because the allegations in Paragraph 395 concern specific claims, but fail to provide necessary claims-identifying information, United lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 395, and, on that basis, denies them.

396. Plaintiffs have characterized the allegations in Paragraph 396 as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, and because the allegations in Paragraph 396 concern specific claims, but fail to provide necessary claims-identifying information, United lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 396, and, on that basis, denies them.

397. Plaintiffs have characterized the allegations in Paragraph 397 as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, and because the allegations in Paragraph 397 concern specific claims, but fail to provide necessary claims-identifying information, United lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 397, and, on that basis, denies them.

398. Plaintiffs have characterized the allegations in Paragraph 398 as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, and because the allegations in Paragraph 398 concern specific claims, but fail to provide necessary claims-identifying information, United lacks knowledge or information

sufficient to form a belief as to the truth of the allegations in Paragraph 398, and, on that basis, denies them.

399. Plaintiffs have characterized the allegations in Paragraph 399 as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, and because the allegations in Paragraph 399 concern specific claims, but fail to provide necessary claims-identifying information, United lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 399, and, on that basis, denies them.

400. Plaintiffs have characterized the allegations in Paragraph 400 as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, and because the allegations in Paragraph 400 concern specific claims, but fail to provide necessary claims-identifying information, United lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 400, and, on that basis, denies them.

401. Plaintiffs have characterized the allegations in Paragraph 401 as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, and because the allegations in Paragraph 401 concern specific claims, but fail to provide necessary claims-identifying information, United lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 401, and, on that basis, denies them.

402. Plaintiffs have characterized the allegations in Paragraph 402 as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, and because the allegations in Paragraph 402 concern specific claims, but fail to provide necessary claims-identifying information, United lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 402, and, on that basis, denies them.

403. Plaintiffs have characterized the allegations in Paragraph 403 as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, United denies the allegations in Paragraph 403.

404. Plaintiffs have characterized the allegations in Paragraph 404 as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, United denies the allegations in Paragraph 404.

405. Plaintiffs have characterized the allegations in Paragraph 405 as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, United denies the allegations in Paragraph 405.

406. Plaintiffs have characterized the allegations in Paragraph 406 as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, United denies the allegations in Paragraph 406.

407. Plaintiffs have characterized the allegations in Paragraph 407 as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, United denies the allegations in Paragraph 407.

408. Plaintiffs have characterized the allegations in Paragraph 408 as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, United denies the allegations in Paragraph 408.

409. Plaintiffs have characterized the allegations in Paragraph 406 as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, United denies the allegations in Paragraph 408.

410. Plaintiffs have characterized the allegations in Paragraph 410 as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, United denies the allegations in Paragraph 410.

411. Plaintiffs have characterized the allegations in Paragraph 411 as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, United denies the allegations in Paragraph 411.

412. Plaintiffs have characterized the allegations in Paragraph 412 as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a

response is required, United denies the allegations in Paragraph 412.

413. Plaintiffs have characterized the allegations in Paragraph 413 as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, United denies the allegations in Paragraph 413.

414. Plaintiffs have characterized the allegations in Paragraph 414 as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, United denies the allegations in Paragraph 414.

415. Plaintiffs have characterized the allegations in Paragraph 415 as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, United denies the allegations in Paragraph 415.

416. Plaintiffs have characterized the allegations in Paragraph 416 as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, and because the allegations in Paragraph 416 concern specific claims, but fail to provide necessary claims-identifying information, United lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 416, and, on that basis, denies them.

417. Plaintiffs have characterized the allegations in Paragraph 417 as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a

response is required, and because the allegations in Paragraph 417 concern specific claims, but fail to provide necessary claims-identifying information, United lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 417, and, on that basis, denies them.

418. Plaintiffs have characterized the allegations in Paragraph 418 as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, and because the allegations in Paragraph 418 concern specific claims, but fail to provide necessary claims-identifying information, United lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 418, and, on that basis, denies them.

419. Plaintiffs have characterized the allegations in Paragraph 419 as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, and because the allegations in Paragraph 419 concern specific claims, but fail to provide necessary claims-identifying information, United lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 419, and, on that basis, denies them.

420. Plaintiffs have characterized the allegations in Paragraph 420 as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, and because the allegations in Paragraph 420 concern specific claims, but fail to provide necessary claims-identifying information, United lacks knowledge or information



sufficient to form a belief as to the truth of the allegations in Paragraph 420, and, on that basis, denies them.

421. Plaintiffs have characterized the allegations in Paragraph 421 as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, and because the allegations in Paragraph 421 concern specific claims, but fail to provide necessary claims-identifying information, United lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 421, and, on that basis, denies them.

422. Plaintiffs have characterized the allegations in Paragraph 422 as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, and because the allegations in Paragraph 422 concern specific claims, but fail to provide necessary claims-identifying information, United lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 422, and, on that basis, denies them.

423. Plaintiffs have characterized the allegations in Paragraph 423 as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, and because the allegations in Paragraph 423 concern specific claims, but fail to provide necessary claims-identifying information, United lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 423, and, on that basis, denies them.

424. Plaintiffs have characterized the allegations in Paragraph 424 as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, and because the allegations in Paragraph 424 concern specific claims, but fail to provide necessary claims-identifying information, United lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 424, and, on that basis, denies them.

425. Plaintiffs have characterized the allegations in this Paragraph as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, United denies the allegations in Paragraph 425.

426. Plaintiffs have characterized the allegations in this Paragraph as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, United denies the allegations in Paragraph 426.

427. Plaintiffs have characterized the allegations in this Paragraph as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, United denies the allegations in Paragraph 427.

428. Plaintiffs have characterized the allegations in this Paragraph as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, United denies the allegations in Paragraph 428.

429. Plaintiffs have characterized the allegations in this Paragraph as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, United denies the allegations in Paragraph 429.

430. Plaintiffs have characterized the allegations in this paragraph as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, and because the allegations in this paragraph concern specific claims, but fail to provide necessary claims-identifying information, United lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 430, and, on that basis, denies them.

431. Plaintiffs have characterized the allegations in this paragraph as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, and because the allegations in this paragraph concern specific claims, but fail to provide necessary claims-identifying information, United lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 431, and, on that basis, denies them.

432. Plaintiffs have characterized the allegations in this paragraph as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, and because the allegations in this paragraph concern specific claims, but fail to provide necessary claims-identifying information, United lacks knowledge or information

sufficient to form a belief as to the truth of the allegations in Paragraph 432, and, on that basis, denies them.

433. Plaintiffs have characterized the allegations in this paragraph as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, and because the allegations in this paragraph concern specific claims, but fail to provide necessary claims-identifying information, United lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 433, and, on that basis, denies them.

434. Plaintiffs have characterized the allegations in this paragraph as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, and because the allegations in this paragraph concern specific claims, but fail to provide necessary claims-identifying information, United lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 434, and, on that basis, denies them.

435. Plaintiffs have characterized the allegations in this paragraph as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, and because the allegations in this paragraph concern specific claims, but fail to provide necessary claims-identifying information, United lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 435, and, on that basis, denies them.

436. Plaintiffs have characterized the allegations in this paragraph as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, and because the allegations in this paragraph concern specific claims, but fail to provide necessary claims-identifying information, United lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 436, and, on that basis, denies them.

437. Plaintiffs have characterized the allegations in this paragraph as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, and because the allegations in this paragraph concern specific claims, but fail to provide necessary claims-identifying information, United lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 437, and, on that basis, denies them.

438. Plaintiffs have characterized the allegations in this paragraph as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, and because the allegations in this paragraph concern specific claims, but fail to provide necessary claims-identifying information, United lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 438, and, on that basis, denies them.

439. Plaintiffs have characterized the allegations in this Paragraph as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021

order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, United denies the allegations in Paragraph 439.

440. Plaintiffs have characterized the allegations in this Paragraph as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, United denies the allegations in Paragraph 440.

441. Plaintiffs have characterized the allegations in this Paragraph as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, United denies the allegations in Paragraph 441.

442. Plaintiffs have characterized the allegations in this Paragraph as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, United denies the allegations in Paragraph 442.

443. Plaintiffs have characterized the allegations in this Paragraph as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, United denies the allegations in Paragraph 443.

444. Plaintiffs have characterized the allegations in this paragraph as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, and because the allegations in this paragraph concern specific claims, but fail to provide necessary claims-identifying information, United lacks knowledge or information

sufficient to form a belief as to the truth of the allegations in Paragraph 444, and, on that basis, denies them.

445. Plaintiffs have characterized the allegations in this paragraph as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, and because the allegations in this paragraph concern specific claims, but fail to provide necessary claims-identifying information, United lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 445, and, on that basis, denies them.

446. Plaintiffs have characterized the allegations in this paragraph as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, and because the allegations in this paragraph concern specific claims, but fail to provide necessary claims-identifying information, United lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 446, and, on that basis, denies them.

447. Plaintiffs have characterized the allegations in this paragraph as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, and because the allegations in this paragraph concern specific claims, but fail to provide necessary claims-identifying information, United lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 447, and, on that basis, denies them.

448. Plaintiffs have characterized the allegations in this paragraph as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, and because the allegations in this paragraph concern specific claims, but fail to provide necessary claims-identifying information, United lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 448, and, on that basis, denies them.

449. Plaintiffs have characterized the allegations in this paragraph as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, and because the allegations in this paragraph concern specific claims, but fail to provide necessary claims-identifying information, United lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 449, and, on that basis, denies them.

450. Plaintiffs have characterized the allegations in this paragraph as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, and because the allegations in this paragraph concern specific claims, but fail to provide necessary claims-identifying information, United lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 450, and, on that basis, denies them.

451. Plaintiffs have characterized the allegations in this paragraph as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021



order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, and because the allegations in this paragraph concern specific claims, but fail to provide necessary claims-identifying information, United lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 451, and, on that basis, denies them.

452. Plaintiffs have characterized the allegations in this paragraph as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, and because the allegations in this paragraph concern specific claims, but fail to provide necessary claims-identifying information, United lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 452, and, on that basis, denies them.

453. Plaintiffs have characterized the allegations in this paragraph as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, United denies the allegations in Paragraph 453.

454. Plaintiffs have characterized the allegations in this paragraph as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, United denies the allegations in Paragraph 454.

455. Plaintiffs have characterized the allegations in this paragraph as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a

response is required, United denies the allegations in Paragraph 455.

456. Plaintiffs have characterized the allegations in this paragraph as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, United denies the allegations in Paragraph 456.

457. Plaintiffs have characterized the allegations in this paragraph as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, United denies the allegations in Paragraph 457.

458. Plaintiffs have characterized the allegations in this paragraph as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, and because the allegations in this paragraph concern specific claims, but fail to provide necessary claims-identifying information, United lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 458, and, on that basis, denies them.

459. Plaintiffs have characterized the allegations in this paragraph as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, and because the allegations in this paragraph concern specific claims, but fail to provide necessary claims-identifying information, United lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 459, and, on that basis, denies them.

460. Plaintiffs have characterized the allegations in this paragraph as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, and because the allegations in this paragraph concern specific claims, but fail to provide necessary claims-identifying information, United lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 460, and, on that basis, denies them.

461. Plaintiffs have characterized the allegations in this paragraph as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, and because the allegations in this paragraph concern specific claims, but fail to provide necessary claims-identifying information, United lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 461, and, on that basis, denies them.

462. Plaintiffs have characterized the allegations in this paragraph as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, and because the allegations in this paragraph concern specific claims, but fail to provide necessary claims-identifying information, United lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 462, and, on that basis, denies them.

463. Plaintiffs have characterized the allegations in this paragraph as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021

order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, and because the allegations in this paragraph concern specific claims, but fail to provide necessary claims-identifying information, United lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 463, and, on that basis, denies them.

464. Plaintiffs have characterized the allegations in this paragraph as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, and because the allegations in this paragraph concern specific claims, but fail to provide necessary claims-identifying information, United lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 464, and, on that basis, denies them.

465. Plaintiffs have characterized the allegations in this paragraph as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, and because the allegations in this paragraph concern specific claims, but fail to provide necessary claims-identifying information, United lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 465, and, on that basis, denies them.

466. Plaintiffs have characterized the allegations in this paragraph as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, and because the allegations in this paragraph concern specific claims, but fail

to provide necessary claims-identifying information, United lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 466, and, on that basis, denies them.

467. Plaintiffs have characterized the allegations in this paragraph as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, United denies the allegations in Paragraph 467.

468. Plaintiffs have characterized the allegations in this paragraph as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, United denies the allegations in Paragraph 468.

469. Plaintiffs have characterized the allegations in this paragraph as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, United denies the allegations in Paragraph 469.

470. Plaintiffs have characterized the allegations in this paragraph as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, United denies the allegations in Paragraph 470.

471. Plaintiffs have characterized the allegations in this paragraph as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, United denies the allegations in Paragraph 471.

472. Plaintiffs have characterized the allegations in this paragraph as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, and because the allegations in this paragraph concern specific claims, but fail to provide necessary claims-identifying information, United lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 472, and, on that basis, denies them.

473. Plaintiffs have characterized the allegations in this paragraph as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, and because the allegations in this paragraph concern specific claims, but fail to provide necessary claims-identifying information, United lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 473, and, on that basis, denies them.

474. Plaintiffs have characterized the allegations in this paragraph as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, and because the allegations in this paragraph concern specific claims, but fail to provide necessary claims-identifying information, United lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 474, and, on that basis, denies them.

475. Plaintiffs have characterized the allegations in this paragraph as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021

order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, and because the allegations in this paragraph concern specific claims, but fail to provide necessary claims-identifying information, United lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 475, and, on that basis, denies them.

476. Plaintiffs have characterized the allegations in this paragraph as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, and because the allegations in this paragraph concern specific claims, but fail to provide necessary claims-identifying information, United lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 476, and, on that basis, denies them.

477. Plaintiffs have characterized the allegations in this paragraph as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, and because the allegations in this paragraph concern specific claims, but fail to provide necessary claims-identifying information, United lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 477, and, on that basis, denies them.

478. Plaintiffs have characterized the allegations in this paragraph as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, and because the allegations in this paragraph concern specific claims, but fail

to provide necessary claims-identifying information, United lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 478, and, on that basis, denies them.

479. Plaintiffs have characterized the allegations in this paragraph as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, and because the allegations in this paragraph concern specific claims, but fail to provide necessary claims-identifying information, United lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 479, and, on that basis, denies them.

480. Plaintiffs have characterized the allegations in this paragraph as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, and because the allegations in this paragraph concern specific claims, but fail to provide necessary claims-identifying information, United lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 480, and, on that basis, denies them.

481. Plaintiffs have characterized the allegations in this paragraph as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, United denies the allegations in Paragraph 481.

482. Plaintiffs have characterized the allegations in this paragraph as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021



order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, United denies the allegations in Paragraph 482.

483. Plaintiffs have characterized the allegations in this paragraph as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, United denies the allegations in Paragraph 483.

484. Plaintiffs have characterized the allegations in this paragraph as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, United denies the allegations in Paragraph 484.

485. Plaintiffs have characterized the allegations in this paragraph as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, United denies the allegations in Paragraph 485.

486. Plaintiffs have characterized the allegations in this paragraph as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, and because the allegations in this paragraph concern specific claims, but fail to provide necessary claims-identifying information, United lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 486, and, on that basis, denies them.

487. Plaintiffs have characterized the allegations in this paragraph as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021

order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, and because the allegations in this paragraph concern specific claims, but fail to provide necessary claims-identifying information, United lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 487, and, on that basis, denies them.

488. Plaintiffs have characterized the allegations in this paragraph as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, and because the allegations in this paragraph concern specific claims, but fail to provide necessary claims-identifying information, United lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 488, and, on that basis, denies them.

489. Plaintiffs have characterized the allegations in this paragraph as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, and because the allegations in this paragraph concern specific claims, but fail to provide necessary claims-identifying information, United lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 489, and, on that basis, denies them.

490. Plaintiffs have characterized the allegations in this paragraph as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, and because the allegations in this paragraph concern specific claims, but fail

to provide necessary claims-identifying information, United lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 490, and, on that basis, denies them.

491. Plaintiffs have characterized the allegations in this paragraph as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, and because the allegations in this paragraph concern specific claims, but fail to provide necessary claims-identifying information, United lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 491, and, on that basis, denies them.

492. Plaintiffs have characterized the allegations in this paragraph as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, and because the allegations in this paragraph concern specific claims, but fail to provide necessary claims-identifying information, United lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 492, and, on that basis, denies them.

493. Plaintiffs have characterized the allegations in this paragraph as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, and because the allegations in this paragraph concern specific claims, but fail to provide necessary claims-identifying information, United lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 493, and, on that basis,

denies them.

494. Plaintiffs have characterized the allegations in this paragraph as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, and because the allegations in this paragraph concern specific claims, but fail to provide necessary claims-identifying information, United lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 494, and, on that basis, denies them.

495. Plaintiffs have characterized the allegations in this paragraph as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, United denies the allegations in Paragraph 495.

496. Plaintiffs have characterized the allegations in this paragraph as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, United denies the allegations in Paragraph 496.

497. Plaintiffs have characterized the allegations in this paragraph as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, United denies the allegations in Paragraph 497.

498. Plaintiffs have characterized the allegations in this paragraph as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a

response is required, United denies the allegations in Paragraph 498.

499. Plaintiffs have characterized the allegations in this paragraph as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, United denies the allegations in Paragraph 499.

500. Plaintiffs have characterized the allegations in this paragraph as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, and because the allegations in this paragraph concern specific claims, but fail to provide necessary claims-identifying information, United lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 500, and, on that basis, denies them.

501. Plaintiffs have characterized the allegations in this paragraph as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, and because the allegations in this paragraph concern specific claims, but fail to provide necessary claims-identifying information, United lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 501, and, on that basis, denies them.

502. Plaintiffs have characterized the allegations in this paragraph as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, and because the allegations in this paragraph concern specific claims, but fail

to provide necessary claims-identifying information, United lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 502, and, on that basis, denies them.

503. Plaintiffs have characterized the allegations in this paragraph as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, and because the allegations in this paragraph concern specific claims, but fail to provide necessary claims-identifying information, United lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 503, and, on that basis, denies them.

504. Plaintiffs have characterized the allegations in this paragraph as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, and because the allegations in this paragraph concern specific claims, but fail to provide necessary claims-identifying information, United lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 504, and, on that basis, denies them.

505. Plaintiffs have characterized the allegations in this paragraph as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, and because the allegations in this paragraph concern specific claims, but fail to provide necessary claims-identifying information, United lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 505, and, on that basis,

denies them.

506. Plaintiffs have characterized the allegations in this paragraph as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, and because the allegations in this paragraph concern specific claims, but fail to provide necessary claims-identifying information, United lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 506, and, on that basis, denies them.

507. Plaintiffs have characterized the allegations in this paragraph as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, and because the allegations in this paragraph concern specific claims, but fail to provide necessary claims-identifying information, United lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 507, and, on that basis, denies them.

508. Plaintiffs have characterized the allegations in this paragraph as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, and because the allegations in this paragraph concern specific claims, but fail to provide necessary claims-identifying information, United lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 508, and, on that basis, denies them.

509. Plaintiffs have characterized the allegations in this paragraph as a “Predicate Act”

in support of Counts I and II of the Complaint. However, because the Court's September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, United denies the allegations in Paragraph 509.

510. Plaintiffs have characterized the allegations in this paragraph as a "Predicate Act" in support of Counts I and II of the Complaint. However, because the Court's September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, United denies the allegations in Paragraph 510.

511. Plaintiffs have characterized the allegations in this paragraph as a "Predicate Act" in support of Counts I and II of the Complaint. However, because the Court's September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, United denies the allegations in Paragraph 511.

512. Plaintiffs have characterized the allegations in this paragraph as a "Predicate Act" in support of Counts I and II of the Complaint. However, because the Court's September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, United denies the allegations in Paragraph 512.

513. Plaintiffs have characterized the allegations in this paragraph as a "Predicate Act" in support of Counts I and II of the Complaint. However, because the Court's September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, United denies the allegations in Paragraph 513.

514. Plaintiffs have characterized the allegations in this paragraph as a "Predicate Act" in support of Counts I and II of the Complaint. However, because the Court's September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, United denies the allegations in Paragraph 514.



515. Plaintiffs have characterized the allegations in this paragraph as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, United denies the allegations in Paragraph 515.

516. Plaintiffs have characterized the allegations in this paragraph as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, United denies the allegations in Paragraph 516.

517. Plaintiffs have characterized the allegations in this paragraph as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, United denies the allegations in Paragraph 517.

518. Plaintiffs have characterized the allegations in this paragraph as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, United denies the allegations in Paragraph 518.

519. Plaintiffs have characterized the allegations in this paragraph as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, United denies the allegations in Paragraph 519.

520. Plaintiffs have characterized the allegations in this paragraph as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a

response is required, United denies the allegations in Paragraph 520.

521. Plaintiffs have characterized the allegations in this paragraph as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, United denies the allegations in Paragraph 521.

522. Plaintiffs have characterized the allegations in this paragraph as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, United denies the allegations in Paragraph 522.

523. Plaintiffs have characterized the allegations in this paragraph as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, United denies the allegations in Paragraph 523.

524. Plaintiffs have characterized the allegations in this paragraph as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, and because the allegations in this paragraph concern specific claims, but fail to provide necessary claims-identifying information, United lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 524, and, on that basis, denies them.

525. Plaintiffs have characterized the allegations in this paragraph as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a

response is required, and because the allegations in this paragraph concern specific claims, but fail to provide necessary claims-identifying information, United lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 525, and, on that basis, denies them.

526. Plaintiffs have characterized the allegations in this paragraph as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, and because the allegations in this paragraph concern specific claims, but fail to provide necessary claims-identifying information, United lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 526, and, on that basis, denies them.

527. Plaintiffs have characterized the allegations in this paragraph as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, and because the allegations in this paragraph concern specific claims, but fail to provide necessary claims-identifying information, United lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 527, and, on that basis, denies them.

528. Plaintiffs have characterized the allegations in this paragraph as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, and because the allegations in this paragraph concern specific claims, but fail to provide necessary claims-identifying information, United lacks knowledge or information

sufficient to form a belief as to the truth of the allegations in Paragraph 528, and, on that basis, denies them.

529. Plaintiffs have characterized the allegations in this paragraph as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, and because the allegations in this paragraph concern specific claims, but fail to provide necessary claims-identifying information, United lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 529, and, on that basis, denies them.

530. Plaintiffs have characterized the allegations in this paragraph as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, and because the allegations in this paragraph concern specific claims, but fail to provide necessary claims-identifying information, United lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 530, and, on that basis, denies them.

531. Plaintiffs have characterized the allegations in this paragraph as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, and because the allegations in this paragraph concern specific claims, but fail to provide necessary claims-identifying information, United lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 531, and, on that basis, denies them.

532. Plaintiffs have characterized the allegations in this paragraph as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, and because the allegations in this paragraph concern specific claims, but fail to provide necessary claims-identifying information, United lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 532, and, on that basis, denies them.

533. Plaintiffs have characterized the allegations in this paragraph as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, United denies the allegations in Paragraph 533.

534. Plaintiffs have characterized the allegations in this paragraph as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, United denies the allegations in Paragraph 534.

535. Plaintiffs have characterized the allegations in this paragraph as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, United denies the allegations in Paragraph 535.

536. Plaintiffs have characterized the allegations in this paragraph as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, United denies the allegations in Paragraph 536.

537. Plaintiffs have characterized the allegations in this paragraph as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, United denies the allegations in Paragraph 537.

538. Plaintiffs have characterized the allegations in this paragraph as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, and because the allegations in this paragraph concern specific claims, but fail to provide necessary claims-identifying information, United lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 538, and, on that basis, denies them.

539. Plaintiffs have characterized the allegations in this paragraph as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, and because the allegations in this paragraph concern specific claims, but fail to provide necessary claims-identifying information, United lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 539, and, on that basis, denies them.

540. Plaintiffs have characterized the allegations in this paragraph as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, and because the allegations in this paragraph concern specific claims, but fail to provide necessary claims-identifying information, United lacks knowledge or information

sufficient to form a belief as to the truth of the allegations in Paragraph 540, and, on that basis, denies them.

541. Plaintiffs have characterized the allegations in this paragraph as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, and because the allegations in this paragraph concern specific claims, but fail to provide necessary claims-identifying information, United lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 541, and, on that basis, denies them.

542. Plaintiffs have characterized the allegations in this paragraph as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, and because the allegations in this paragraph concern specific claims, but fail to provide necessary claims-identifying information, United lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 542, and, on that basis, denies them.

543. Plaintiffs have characterized the allegations in this paragraph as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, and because the allegations in this paragraph concern specific claims, but fail to provide necessary claims-identifying information, United lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 543, and, on that basis, denies them.

544. Plaintiffs have characterized the allegations in this paragraph as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, and because the allegations in this paragraph concern specific claims, but fail to provide necessary claims-identifying information, United lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 544, and, on that basis, denies them.

545. Plaintiffs have characterized the allegations in this paragraph as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, and because the allegations in this paragraph concern specific claims, but fail to provide necessary claims-identifying information, United lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 545, and, on that basis, denies them.

546. Plaintiffs have characterized the allegations in this paragraph as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, United denies the allegations in Paragraph 546.

547. Plaintiffs have characterized the allegations in this paragraph as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, United denies the allegations in Paragraph 547.

548. Plaintiffs have characterized the allegations in this paragraph as a “Predicate Act”



in support of Counts I and II of the Complaint. However, because the Court's September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, United denies the allegations in Paragraph 548.

549. Plaintiffs have characterized the allegations in this paragraph as a "Predicate Act" in support of Counts I and II of the Complaint. However, because the Court's September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, United denies the allegations in Paragraph 549.

550. Plaintiffs have characterized the allegations in this paragraph as a "Predicate Act" in support of Counts I and II of the Complaint. However, because the Court's September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, United denies the allegations in Paragraph 550.

551. Plaintiffs have characterized the allegations in this paragraph as a "Predicate Act" in support of Counts I and II of the Complaint. However, because the Court's September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, and because the allegations in this paragraph concern specific claims, but fail to provide necessary claims-identifying information, United lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 551, and, on that basis, denies them.

552. Plaintiffs have characterized the allegations in this paragraph as a "Predicate Act" in support of Counts I and II of the Complaint. However, because the Court's September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, and because the allegations in this paragraph concern specific claims, but fail to provide necessary claims-identifying information, United lacks knowledge or information

sufficient to form a belief as to the truth of the allegations in Paragraph 552, and, on that basis, denies them.

553. Plaintiffs have characterized the allegations in this paragraph as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, and because the allegations in this paragraph concern specific claims, but fail to provide necessary claims-identifying information, United lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 553, and, on that basis, denies them.

554. Plaintiffs have characterized the allegations in this paragraph as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, and because the allegations in this paragraph concern specific claims, but fail to provide necessary claims-identifying information, United lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 554, and, on that basis, denies them.

555. Plaintiffs have characterized the allegations in this paragraph as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, and because the allegations in this paragraph concern specific claims, but fail to provide necessary claims-identifying information, United lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 555, and, on that basis, denies them.

556. Plaintiffs have characterized the allegations in this paragraph as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, and because the allegations in this paragraph concern specific claims, but fail to provide necessary claims-identifying information, United lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 556, and, on that basis, denies them.

557. Plaintiffs have characterized the allegations in this paragraph as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, and because the allegations in this paragraph concern specific claims, but fail to provide necessary claims-identifying information, United lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 557, and, on that basis, denies them.

558. Plaintiffs have characterized the allegations in this paragraph as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, and because the allegations in this paragraph concern specific claims, but fail to provide necessary claims-identifying information, United lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 558, and, on that basis, denies them.

559. Plaintiffs have characterized the allegations in this paragraph as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021

order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, and because the allegations in this paragraph concern specific claims, but fail to provide necessary claims-identifying information, United lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 559, and, on that basis, denies them.

560. Plaintiffs have characterized the allegations in this paragraph as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, United denies the allegations in Paragraph 560.

561. Plaintiffs have characterized the allegations in this paragraph as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, United denies the allegations in Paragraph 561.

562. Plaintiffs have characterized the allegations in this paragraph as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, United denies the allegations in Paragraph 562.

563. Plaintiffs have characterized the allegations in this paragraph as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, United denies the allegations in Paragraph 563.

564. Plaintiffs have characterized the allegations in this paragraph as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021

order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, United denies the allegations in Paragraph 564.

565. Plaintiffs have characterized the allegations in this paragraph as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, United denies the allegations in Paragraph 565.

566. Plaintiffs have characterized the allegations in this paragraph as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, United denies the allegations in Paragraph 566.

567. Plaintiffs have characterized the allegations in this paragraph as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, United denies the allegations in Paragraph 567.

568. Plaintiffs have characterized the allegations in this paragraph as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, United denies the allegations in Paragraph 568.

569. Plaintiffs have characterized the allegations in this paragraph as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, United denies the allegations in Paragraph 569.

570. Plaintiffs have characterized the allegations in this paragraph as a “Predicate Act”

in support of Counts I and II of the Complaint. However, because the Court's September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, United denies the allegations in Paragraph 570.

571. Plaintiffs have characterized the allegations in this paragraph as a "Predicate Act" in support of Counts I and II of the Complaint. However, because the Court's September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, United denies the allegations in Paragraph 571.

572. Plaintiffs have characterized the allegations in this paragraph as a "Predicate Act" in support of Counts I and II of the Complaint. However, because the Court's September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, and because the allegations in this paragraph concern specific claims, but fail to provide necessary claims-identifying information, United lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 572, and, on that basis, denies them.

573. Plaintiffs have characterized the allegations in this paragraph as a "Predicate Act" in support of Counts I and II of the Complaint. However, because the Court's September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, and because the allegations in this paragraph concern specific claims, but fail to provide necessary claims-identifying information, United lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 573, and, on that basis, denies them.

574. Plaintiffs have characterized the allegations in this paragraph as a "Predicate Act" in support of Counts I and II of the Complaint. However, because the Court's September 28, 2021

order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, and because the allegations in this paragraph concern specific claims, but fail to provide necessary claims-identifying information, United lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 574, and, on that basis, denies them.

575. Plaintiffs have characterized the allegations in this paragraph as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, and because the allegations in this paragraph concern specific claims, but fail to provide necessary claims-identifying information, United lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 575, and, on that basis, denies them.

576. Plaintiffs have characterized the allegations in this paragraph as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, and because the allegations in this paragraph concern specific claims, but fail to provide necessary claims-identifying information, United lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 576, and, on that basis, denies them.

577. Plaintiffs have characterized the allegations in this paragraph as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, and because the allegations in this paragraph concern specific claims, but fail

to provide necessary claims-identifying information, United lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 577, and, on that basis, denies them.

578. Plaintiffs have characterized the allegations in this paragraph as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, and because the allegations in this paragraph concern specific claims, but fail to provide necessary claims-identifying information, United lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 578, and, on that basis, denies them.

579. Plaintiffs have characterized the allegations in this paragraph as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, and because the allegations in this paragraph concern specific claims, but fail to provide necessary claims-identifying information, United lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 579, and, on that basis, denies them.

580. Plaintiffs have characterized the allegations in this paragraph as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, and because the allegations in this paragraph concern specific claims, but fail to provide necessary claims-identifying information, United lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 580, and, on that basis,



denies them.

581. Plaintiffs have characterized the allegations in this paragraph as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, United denies the allegations in Paragraph 581.

582. Plaintiffs have characterized the allegations in this paragraph as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, United denies the allegations in Paragraph 582.

583. Plaintiffs have characterized the allegations in this paragraph as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, United denies the allegations in Paragraph 583.

584. Plaintiffs have characterized the allegations in this paragraph as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, United denies the allegations in Paragraph 584.

585. Plaintiffs have characterized the allegations in this paragraph as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, United denies the allegations in Paragraph 585.

586. Plaintiffs have characterized the allegations in this paragraph as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021

order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, and because the allegations in this paragraph concern specific claims, but fail to provide necessary claims-identifying information, United lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 586, and, on that basis, denies them.

587. Plaintiffs have characterized the allegations in this paragraph as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, and because the allegations in this paragraph concern specific claims, but fail to provide necessary claims-identifying information, United lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 587, and, on that basis, denies them.

588. Plaintiffs have characterized the allegations in this paragraph as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, and because the allegations in this paragraph concern specific claims, but fail to provide necessary claims-identifying information, United lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 588, and, on that basis, denies them.

589. Plaintiffs have characterized the allegations in this paragraph as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, and because the allegations in this paragraph concern specific claims, but fail

to provide necessary claims-identifying information, United lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 589, and, on that basis, denies them.

590. Plaintiffs have characterized the allegations in this paragraph as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, and because the allegations in this paragraph concern specific claims, but fail to provide necessary claims-identifying information, United lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 590, and, on that basis, denies them.

591. Plaintiffs have characterized the allegations in this paragraph as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, and because the allegations in this paragraph concern specific claims, but fail to provide necessary claims-identifying information, United lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 591, and, on that basis, denies them.

592. Plaintiffs have characterized the allegations in this paragraph as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, and because the allegations in this paragraph concern specific claims, but fail to provide necessary claims-identifying information, United lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 592, and, on that basis,

denies them.

593. Plaintiffs have characterized the allegations in this paragraph as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, and because the allegations in this paragraph concern specific claims, but fail to provide necessary claims-identifying information, United lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 593, and, on that basis, denies them.

594. Plaintiffs have characterized the allegations in this paragraph as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, and because the allegations in this paragraph concern specific claims, but fail to provide necessary claims-identifying information, United lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 594, and, on that basis, denies them.

595. Plaintiffs have characterized the allegations in this paragraph as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, United denies the allegations in Paragraph 595.

596. Plaintiffs have characterized the allegations in this paragraph as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, United denies the allegations in Paragraph 596.

597. Plaintiffs have characterized the allegations in this paragraph as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, United denies the allegations in Paragraph 597.

598. Plaintiffs have characterized the allegations in this paragraph as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, United denies the allegations in Paragraph 598.

599. Plaintiffs have characterized the allegations in this paragraph as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, United denies the allegations in Paragraph 599.

600. Plaintiffs have characterized the allegations in this paragraph as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, and because the allegations in this paragraph concern specific claims, but fail to provide necessary claims-identifying information, United lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 600, and, on that basis, denies them.

601. Plaintiffs have characterized the allegations in this paragraph as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, and because the allegations in this paragraph concern specific claims, but fail

to provide necessary claims-identifying information, United lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 601, and, on that basis, denies them.

602. Plaintiffs have characterized the allegations in this paragraph as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, and because the allegations in this paragraph concern specific claims, but fail to provide necessary claims-identifying information, United lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 602, and, on that basis, denies them.

603. Plaintiffs have characterized the allegations in this paragraph as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, and because the allegations in this paragraph concern specific claims, but fail to provide necessary claims-identifying information, United lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 603, and, on that basis, denies them.

604. Plaintiffs have characterized the allegations in this paragraph as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, and because the allegations in this paragraph concern specific claims, but fail to provide necessary claims-identifying information, United lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 604, and, on that basis,

denies them.

605. Plaintiffs have characterized the allegations in this paragraph as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, and because the allegations in this paragraph concern specific claims, but fail to provide necessary claims-identifying information, United lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 605, and, on that basis, denies them.

606. Plaintiffs have characterized the allegations in this paragraph as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, and because the allegations in this paragraph concern specific claims, but fail to provide necessary claims-identifying information, United lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 606, and, on that basis, denies them.

607. Plaintiffs have characterized the allegations in this paragraph as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, and because the allegations in this paragraph concern specific claims, but fail to provide necessary claims-identifying information, United lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 607, and, on that basis, denies them.

608. Plaintiffs have characterized the allegations in this paragraph as a “Predicate Act”

in support of Counts I and II of the Complaint. However, because the Court's September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, and because the allegations in this paragraph concern specific claims, but fail to provide necessary claims-identifying information, United lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 608, and, on that basis, denies them.

609. Plaintiffs have characterized the allegations in this paragraph as a "Predicate Act" in support of Counts I and II of the Complaint. However, because the Court's September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, United denies the allegations in Paragraph 609.

610. Plaintiffs have characterized the allegations in this paragraph as a "Predicate Act" in support of Counts I and II of the Complaint. However, because the Court's September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, United denies the allegations in Paragraph 610.

611. Plaintiffs have characterized the allegations in this paragraph as a "Predicate Act" in support of Counts I and II of the Complaint. However, because the Court's September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, United denies the allegations in Paragraph 611.

612. Plaintiffs have characterized the allegations in this paragraph as a "Predicate Act" in support of Counts I and II of the Complaint. However, because the Court's September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, United denies the allegations in Paragraph 612.



613. Plaintiffs have characterized the allegations in this paragraph as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, United denies the allegations in Paragraph 613.

614. Plaintiffs have characterized the allegations in this paragraph as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, and because the allegations in this paragraph concern specific claims, but fail to provide necessary claims-identifying information, United lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 614, and, on that basis, denies them.

615. Plaintiffs have characterized the allegations in this paragraph as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, and because the allegations in this paragraph concern specific claims, but fail to provide necessary claims-identifying information, United lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 615, and, on that basis, denies them.

616. Plaintiffs have characterized the allegations in this paragraph as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, and because the allegations in this paragraph concern specific claims, but fail to provide necessary claims-identifying information, United lacks knowledge or information

sufficient to form a belief as to the truth of the allegations in Paragraph 616, and, on that basis, denies them.

617. Plaintiffs have characterized the allegations in this paragraph as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, and because the allegations in this paragraph concern specific claims, but fail to provide necessary claims-identifying information, United lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 617, and, on that basis, denies them.

618. Plaintiffs have characterized the allegations in this paragraph as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, and because the allegations in this paragraph concern specific claims, but fail to provide necessary claims-identifying information, United lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 618, and, on that basis, denies them.

619. Plaintiffs have characterized the allegations in this paragraph as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, and because the allegations in this paragraph concern specific claims, but fail to provide necessary claims-identifying information, United lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 619, and, on that basis, denies them.

620. Plaintiffs have characterized the allegations in this paragraph as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, and because the allegations in this paragraph concern specific claims, but fail to provide necessary claims-identifying information, United lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 620, and, on that basis, denies them.

621. Plaintiffs have characterized the allegations in this paragraph as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, and because the allegations in this paragraph concern specific claims, but fail to provide necessary claims-identifying information, United lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 621, and, on that basis, denies them.

622. Plaintiffs have characterized the allegations in this paragraph as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, and because the allegations in this paragraph concern specific claims, but fail to provide necessary claims-identifying information, United lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 622, and, on that basis, denies them.

623. Plaintiffs have characterized the allegations in this paragraph as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021

order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, United denies the allegations in Paragraph 623.

624. Plaintiffs have characterized the allegations in this paragraph as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, United denies the allegations in Paragraph 624.

625. Plaintiffs have characterized the allegations in this paragraph as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, United denies the allegations in Paragraph 625.

626. Plaintiffs have characterized the allegations in this paragraph as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, United denies the allegations in Paragraph 626.

627. Plaintiffs have characterized the allegations in this paragraph as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, United denies the allegations in Paragraph 627.

628. Plaintiffs have characterized the allegations in this paragraph as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, and because the allegations in this paragraph concern specific claims, but fail to provide necessary claims-identifying information, United lacks knowledge or information

sufficient to form a belief as to the truth of the allegations in Paragraph 628, and, on that basis, denies them.

629. Plaintiffs have characterized the allegations in this paragraph as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, and because the allegations in this paragraph concern specific claims, but fail to provide necessary claims-identifying information, United lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 629, and, on that basis, denies them.

630. Plaintiffs have characterized the allegations in this paragraph as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, and because the allegations in this paragraph concern specific claims, but fail to provide necessary claims-identifying information, United lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 630, and, on that basis, denies them.

631. Plaintiffs have characterized the allegations in this paragraph as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, and because the allegations in this paragraph concern specific claims, but fail to provide necessary claims-identifying information, United lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 631, and, on that basis, denies them.

632. Plaintiffs have characterized the allegations in this paragraph as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, and because the allegations in this paragraph concern specific claims, but fail to provide necessary claims-identifying information, United lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 632, and, on that basis, denies them.

633. Plaintiffs have characterized the allegations in this paragraph as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, and because the allegations in this paragraph concern specific claims, but fail to provide necessary claims-identifying information, United lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 633, and, on that basis, denies them.

634. Plaintiffs have characterized the allegations in this paragraph as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, and because the allegations in this paragraph concern specific claims, but fail to provide necessary claims-identifying information, United lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 634, and, on that basis, denies them.

635. Plaintiffs have characterized the allegations in this paragraph as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021

order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, and because the allegations in this paragraph concern specific claims, but fail to provide necessary claims-identifying information, United lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 635, and, on that basis, denies them.

636. Plaintiffs have characterized the allegations in this paragraph as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, and because the allegations in this paragraph concern specific claims, but fail to provide necessary claims-identifying information, United lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 636, and, on that basis, denies them.

637. Plaintiffs have characterized the allegations in this paragraph as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, United denies the allegations in Paragraph 637.

638. Plaintiffs have characterized the allegations in this paragraph as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, United denies the allegations in Paragraph 638.

639. Plaintiffs have characterized the allegations in this paragraph as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a

response is required, United denies the allegations in Paragraph 639.

640. Plaintiffs have characterized the allegations in this paragraph as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, United denies the allegations in Paragraph 640.

641. Plaintiffs have characterized the allegations in this paragraph as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, United denies the allegations in Paragraph 641.

642. Plaintiffs have characterized the allegations in this paragraph as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, and because the allegations in this paragraph concern specific claims, but fail to provide necessary claims-identifying information, United lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 642, and, on that basis, denies them.

643. Plaintiffs have characterized the allegations in this paragraph as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, and because the allegations in this paragraph concern specific claims, but fail to provide necessary claims-identifying information, United lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 643, and, on that basis, denies them.



644. Plaintiffs have characterized the allegations in this paragraph as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, and because the allegations in this paragraph concern specific claims, but fail to provide necessary claims-identifying information, United lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 644, and, on that basis, denies them.

645. Plaintiffs have characterized the allegations in this paragraph as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, and because the allegations in this paragraph concern specific claims, but fail to provide necessary claims-identifying information, United lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 645, and, on that basis, denies them.

646. Plaintiffs have characterized the allegations in this paragraph as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, and because the allegations in this paragraph concern specific claims, but fail to provide necessary claims-identifying information, United lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 646, and, on that basis, denies them.

647. Plaintiffs have characterized the allegations in this paragraph as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021

order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, and because the allegations in this paragraph concern specific claims, but fail to provide necessary claims-identifying information, United lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 647, and, on that basis, denies them.

648. Plaintiffs have characterized the allegations in this paragraph as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, and because the allegations in this paragraph concern specific claims, but fail to provide necessary claims-identifying information, United lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 648, and, on that basis, denies them.

649. Plaintiffs have characterized the allegations in this paragraph as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, and because the allegations in this paragraph concern specific claims, but fail to provide necessary claims-identifying information, United lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 649, and, on that basis, denies them.

650. Plaintiffs have characterized the allegations in this paragraph as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, and because the allegations in this paragraph concern specific claims, but fail

to provide necessary claims-identifying information, United lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 650, and, on that basis, denies them.

651. Plaintiffs have characterized the allegations in this paragraph as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, United denies the allegations in Paragraph 651.

652. Plaintiffs have characterized the allegations in this paragraph as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, United denies the allegations in Paragraph 652.

653. Plaintiffs have characterized the allegations in this paragraph as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, United denies the allegations in Paragraph 653.

654. Plaintiffs have characterized the allegations in this paragraph as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, United denies the allegations in Paragraph 654.

655. Plaintiffs have characterized the allegations in this paragraph as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, United denies the allegations in Paragraph 655.

656. Plaintiffs have characterized the allegations in this paragraph as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, United denies the allegations in Paragraph 656.

657. Plaintiffs have characterized the allegations in this paragraph as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, United denies the allegations in Paragraph 657.

658. Plaintiffs have characterized the allegations in this paragraph as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, United denies the allegations in Paragraph 658.

659. Plaintiffs have characterized the allegations in this paragraph as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, United denies the allegations in Paragraph 659.

660. Plaintiffs have characterized the allegations in this paragraph as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, United denies the allegations in Paragraph 660.

661. Plaintiffs have characterized the allegations in this paragraph as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a

response is required, and because the allegations in this paragraph concern specific claims, but fail to provide necessary claims-identifying information, United lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 661, and, on that basis, denies them.

662. Plaintiffs have characterized the allegations in this paragraph as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, and because the allegations in this paragraph concern specific claims, but fail to provide necessary claims-identifying information, United lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 662, and, on that basis, denies them.

663. Plaintiffs have characterized the allegations in this paragraph as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, and because the allegations in this paragraph concern specific claims, but fail to provide necessary claims-identifying information, United lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 663, and, on that basis, denies them.

664. Plaintiffs have characterized the allegations in this paragraph as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, and because the allegations in this paragraph concern specific claims, but fail to provide necessary claims-identifying information, United lacks knowledge or information

sufficient to form a belief as to the truth of the allegations in Paragraph 664, and, on that basis, denies them.

665. Plaintiffs have characterized the allegations in this paragraph as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, and because the allegations in this paragraph concern specific claims, but fail to provide necessary claims-identifying information, United lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 665, and, on that basis, denies them.

666. Plaintiffs have characterized the allegations in this paragraph as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, and because the allegations in this paragraph concern specific claims, but fail to provide necessary claims-identifying information, United lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 666, and, on that basis, denies them.

667. Plaintiffs have characterized the allegations in this paragraph as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, and because the allegations in this paragraph concern specific claims, but fail to provide necessary claims-identifying information, United lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 667, and, on that basis, denies them.

668. Plaintiffs have characterized the allegations in this paragraph as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, and because the allegations in this paragraph concern specific claims, but fail to provide necessary claims-identifying information, United lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 668, and, on that basis, denies them.

669. Plaintiffs have characterized the allegations in this paragraph as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, and because the allegations in this paragraph concern specific claims, but fail to provide necessary claims-identifying information, United lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 669, and, on that basis, denies them.

670. Plaintiffs have characterized the allegations in this paragraph as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, United denies the allegations in Paragraph 670.

671. Plaintiffs have characterized the allegations in this paragraph as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, United denies the allegations in Paragraph 671.

672. Plaintiffs have characterized the allegations in this paragraph as a “Predicate Act”

in support of Counts I and II of the Complaint. However, because the Court's September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, United denies the allegations in Paragraph 672.

673. Plaintiffs have characterized the allegations in this paragraph as a "Predicate Act" in support of Counts I and II of the Complaint. However, because the Court's September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, United denies the allegations in Paragraph 673.

674. Plaintiffs have characterized the allegations in this paragraph as a "Predicate Act" in support of Counts I and II of the Complaint. However, because the Court's September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, United denies the allegations in Paragraph 674.

675. Plaintiffs have characterized the allegations in this paragraph as a "Predicate Act" in support of Counts I and II of the Complaint. However, because the Court's September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, and because the allegations in this paragraph concern specific claims, but fail to provide necessary claims-identifying information, United lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 675, and, on that basis, denies them.

676. Plaintiffs have characterized the allegations in this paragraph as a "Predicate Act" in support of Counts I and II of the Complaint. However, because the Court's September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, and because the allegations in this paragraph concern specific claims, but fail to provide necessary claims-identifying information, United lacks knowledge or information



sufficient to form a belief as to the truth of the allegations in Paragraph 676, and, on that basis, denies them.

677. Plaintiffs have characterized the allegations in this paragraph as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, and because the allegations in this paragraph concern specific claims, but fail to provide necessary claims-identifying information, United lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 677, and, on that basis, denies them.

678. Plaintiffs have characterized the allegations in this paragraph as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, and because the allegations in this paragraph concern specific claims, but fail to provide necessary claims-identifying information, United lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 678, and, on that basis, denies them.

679. Plaintiffs have characterized the allegations in this paragraph as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, and because the allegations in this paragraph concern specific claims, but fail to provide necessary claims-identifying information, United lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 679, and, on that basis, denies them.

680. Plaintiffs have characterized the allegations in this paragraph as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, and because the allegations in this paragraph concern specific claims, but fail to provide necessary claims-identifying information, United lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 680, and, on that basis, denies them.

681. Plaintiffs have characterized the allegations in this paragraph as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, and because the allegations in this paragraph concern specific claims, but fail to provide necessary claims-identifying information, United lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 681, and, on that basis, denies them.

682. Plaintiffs have characterized the allegations in this paragraph as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, and because the allegations in this paragraph concern specific claims, but fail to provide necessary claims-identifying information, United lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 68, and, on that basis, denies them.

683. Plaintiffs have characterized the allegations in this paragraph as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021

order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, and because the allegations in this paragraph concern specific claims, but fail to provide necessary claims-identifying information, United lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 683, and, on that basis, denies them.

684. Plaintiffs have characterized the allegations in this paragraph as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, United denies the allegations in Paragraph 684.

685. Plaintiffs have characterized the allegations in this paragraph as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, United denies the allegations in Paragraph 685.

686. Plaintiffs have characterized the allegations in this paragraph as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, United denies the allegations in Paragraph 686.

687. Plaintiffs have characterized the allegations in this paragraph as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, United denies the allegations in Paragraph 687.

688. Plaintiffs have characterized the allegations in this paragraph as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021

order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, United denies the allegations in Paragraph 688.

689. Plaintiffs have characterized the allegations in this paragraph as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, and because the allegations in this paragraph concern specific claims, but fail to provide necessary claims-identifying information, United lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 689, and, on that basis, denies them.

690. Plaintiffs have characterized the allegations in this paragraph as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, and because the allegations in this paragraph concern specific claims, but fail to provide necessary claims-identifying information, United lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 690, and, on that basis, denies them.

691. Plaintiffs have characterized the allegations in this paragraph as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, and because the allegations in this paragraph concern specific claims, but fail to provide necessary claims-identifying information, United lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 691, and, on that basis, denies them.

692. Plaintiffs have characterized the allegations in this paragraph as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, and because the allegations in this paragraph concern specific claims, but fail to provide necessary claims-identifying information, United lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 692, and, on that basis, denies them.

693. Plaintiffs have characterized the allegations in this paragraph as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, and because the allegations in this paragraph concern specific claims, but fail to provide necessary claims-identifying information, United lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 693, and, on that basis, denies them.

694. Plaintiffs have characterized the allegations in this paragraph as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, and because the allegations in this paragraph concern specific claims, but fail to provide necessary claims-identifying information, United lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 694, and, on that basis, denies them.

695. Plaintiffs have characterized the allegations in this paragraph as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021

order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, and because the allegations in this paragraph concern specific claims, but fail to provide necessary claims-identifying information, United lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 695, and, on that basis, denies them.

696. Plaintiffs have characterized the allegations in this paragraph as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, and because the allegations in this paragraph concern specific claims, but fail to provide necessary claims-identifying information, United lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 696, and, on that basis, denies them.

697. Plaintiffs have characterized the allegations in this paragraph as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, and because the allegations in this paragraph concern specific claims, but fail to provide necessary claims-identifying information, United lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 697, and, on that basis, denies them.

698. Plaintiffs have characterized the allegations in this paragraph as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, United denies the allegations in Paragraph 698.

699. Plaintiffs have characterized the allegations in this paragraph as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, United denies the allegations in Paragraph 699.

700. Plaintiffs have characterized the allegations in this paragraph as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, United denies the allegations in Paragraph 700.

701. Plaintiffs have characterized the allegations in this paragraph as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, United denies the allegations in Paragraph 701.

702. Plaintiffs have characterized the allegations in this paragraph as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, United denies the allegations in Paragraph 702.

703. Plaintiffs have characterized the allegations in this paragraph as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, and because the allegations in this paragraph concern specific claims, but fail to provide necessary claims-identifying information, United lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 703, and, on that basis, denies them.

704. Plaintiffs have characterized the allegations in this paragraph as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, and because the allegations in this paragraph concern specific claims, but fail to provide necessary claims-identifying information, United lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 704, and, on that basis, denies them.

705. Plaintiffs have characterized the allegations in this paragraph as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, and because the allegations in this paragraph concern specific claims, but fail to provide necessary claims-identifying information, United lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 705, and, on that basis, denies them.

706. Plaintiffs have characterized the allegations in this paragraph as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, and because the allegations in this paragraph concern specific claims, but fail to provide necessary claims-identifying information, United lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 706, and, on that basis, denies them.

707. Plaintiffs have characterized the allegations in this paragraph as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021



order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, and because the allegations in this paragraph concern specific claims, but fail to provide necessary claims-identifying information, United lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 707, and, on that basis, denies them.

708. Plaintiffs have characterized the allegations in this paragraph as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, and because the allegations in this paragraph concern specific claims, but fail to provide necessary claims-identifying information, United lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 708, and, on that basis, denies them.

709. Plaintiffs have characterized the allegations in this paragraph as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, and because the allegations in this paragraph concern specific claims, but fail to provide necessary claims-identifying information, United lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 709, and, on that basis, denies them.

710. Plaintiffs have characterized the allegations in this paragraph as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, and because the allegations in this paragraph concern specific claims, but fail

to provide necessary claims-identifying information, United lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 710, and, on that basis, denies them.

711. Plaintiffs have characterized the allegations in this paragraph as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, and because the allegations in this paragraph concern specific claims, but fail to provide necessary claims-identifying information, United lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 711, and, on that basis, denies them.

712. Plaintiffs have characterized the allegations in this paragraph as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, United denies the allegations in Paragraph 712.

713. Plaintiffs have characterized the allegations in this paragraph as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, United denies the allegations in Paragraph 713.

714. Plaintiffs have characterized the allegations in this paragraph as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, United denies the allegations in Paragraph 714.

715. Plaintiffs have characterized the allegations in this paragraph as a “Predicate Act”

in support of Counts I and II of the Complaint. However, because the Court's September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, United denies the allegations in Paragraph 715.

716. Plaintiffs have characterized the allegations in this paragraph as a "Predicate Act" in support of Counts I and II of the Complaint. However, because the Court's September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, United denies the allegations in Paragraph 716.

717. Plaintiffs have characterized the allegations in this paragraph as a "Predicate Act" in support of Counts I and II of the Complaint. However, because the Court's September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, and because the allegations in this paragraph concern specific claims, but fail to provide necessary claims-identifying information, United lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 717, and, on that basis, denies them.

718. Plaintiffs have characterized the allegations in this paragraph as a "Predicate Act" in support of Counts I and II of the Complaint. However, because the Court's September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, and because the allegations in this paragraph concern specific claims, but fail to provide necessary claims-identifying information, United lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 718, and, on that basis, denies them.

719. Plaintiffs have characterized the allegations in this paragraph as a "Predicate Act" in support of Counts I and II of the Complaint. However, because the Court's September 28, 2021

order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, and because the allegations in this paragraph concern specific claims, but fail to provide necessary claims-identifying information, United lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 719, and, on that basis, denies them.

720. Plaintiffs have characterized the allegations in this paragraph as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, and because the allegations in this paragraph concern specific claims, but fail to provide necessary claims-identifying information, United lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 720, and, on that basis, denies them.

721. Plaintiffs have characterized the allegations in this paragraph as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, and because the allegations in this paragraph concern specific claims, but fail to provide necessary claims-identifying information, United lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 721, and, on that basis, denies them.

722. Plaintiffs have characterized the allegations in this paragraph as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, and because the allegations in this paragraph concern specific claims, but fail

to provide necessary claims-identifying information, United lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 722, and, on that basis, denies them.

723. Plaintiffs have characterized the allegations in this paragraph as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, and because the allegations in this paragraph concern specific claims, but fail to provide necessary claims-identifying information, United lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 723, and, on that basis, denies them.

724. Plaintiffs have characterized the allegations in this paragraph as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, and because the allegations in this paragraph concern specific claims, but fail to provide necessary claims-identifying information, United lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 724, and, on that basis, denies them.

725. Plaintiffs have characterized the allegations in this paragraph as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, and because the allegations in this paragraph concern specific claims, but fail to provide necessary claims-identifying information, United lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 725, and, on that basis,

denies them.

726. Plaintiffs have characterized the allegations in this paragraph as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, United denies the allegations in Paragraph 726.

727. Plaintiffs have characterized the allegations in this paragraph as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, United denies the allegations in Paragraph 727.

728. Plaintiffs have characterized the allegations in this paragraph as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, United denies the allegations in Paragraph 728.

729. Plaintiffs have characterized the allegations in this paragraph as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, United denies the allegations in Paragraph 729.

730. Plaintiffs have characterized the allegations in this paragraph as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, United denies the allegations in Paragraph 730.

731. Plaintiffs have characterized the allegations in this paragraph as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021

order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, and because the allegations in this paragraph concern specific claims, but fail to provide necessary claims-identifying information, United lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 731, and, on that basis, denies them.

732. Plaintiffs have characterized the allegations in this paragraph as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, and because the allegations in this paragraph concern specific claims, but fail to provide necessary claims-identifying information, United lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 732, and, on that basis, denies them.

733. Plaintiffs have characterized the allegations in this paragraph as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, and because the allegations in this paragraph concern specific claims, but fail to provide necessary claims-identifying information, United lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 733, and, on that basis, denies them.

734. Plaintiffs have characterized the allegations in this paragraph as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, and because the allegations in this paragraph concern specific claims, but fail

to provide necessary claims-identifying information, United lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 734, and, on that basis, denies them.

735. Plaintiffs have characterized the allegations in this paragraph as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, and because the allegations in this paragraph concern specific claims, but fail to provide necessary claims-identifying information, United lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 735, and, on that basis, denies them.

736. Plaintiffs have characterized the allegations in this paragraph as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, and because the allegations in this paragraph concern specific claims, but fail to provide necessary claims-identifying information, United lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 736, and, on that basis, denies them.

737. Plaintiffs have characterized the allegations in this paragraph as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, and because the allegations in this paragraph concern specific claims, but fail to provide necessary claims-identifying information, United lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 737, and, on that basis,



denies them.

738. Plaintiffs have characterized the allegations in this paragraph as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, and because the allegations in this paragraph concern specific claims, but fail to provide necessary claims-identifying information, United lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 738, and, on that basis, denies them.

739. Plaintiffs have characterized the allegations in this paragraph as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, and because the allegations in this paragraph concern specific claims, but fail to provide necessary claims-identifying information, United lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 739, and, on that basis, denies them.

740. Plaintiffs have characterized the allegations in this paragraph as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, United denies the allegations in Paragraph 740.

741. Plaintiffs have characterized the allegations in this paragraph as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, United denies the allegations in Paragraph 741.

742. Plaintiffs have characterized the allegations in this paragraph as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, United denies the allegations in Paragraph 742.

743. Plaintiffs have characterized the allegations in this paragraph as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, United denies the allegations in Paragraph 743.

744. Plaintiffs have characterized the allegations in this paragraph as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, United denies the allegations in Paragraph 744.

745. Plaintiffs have characterized the allegations in this paragraph as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, and because the allegations in this paragraph concern specific claims, but fail to provide necessary claims-identifying information, United lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 745, and, on that basis, denies them.

746. Plaintiffs have characterized the allegations in this paragraph as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, and because the allegations in this paragraph concern specific claims, but fail

to provide necessary claims-identifying information, United lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 746, and, on that basis, denies them.

747. Plaintiffs have characterized the allegations in this paragraph as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, and because the allegations in this paragraph concern specific claims, but fail to provide necessary claims-identifying information, United lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 747, and, on that basis, denies them.

748. Plaintiffs have characterized the allegations in this paragraph as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, and because the allegations in this paragraph concern specific claims, but fail to provide necessary claims-identifying information, United lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 748, and, on that basis, denies them.

749. Plaintiffs have characterized the allegations in this paragraph as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, and because the allegations in this paragraph concern specific claims, but fail to provide necessary claims-identifying information, United lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 749, and, on that basis,

denies them.

750. Plaintiffs have characterized the allegations in this paragraph as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, and because the allegations in this paragraph concern specific claims, but fail to provide necessary claims-identifying information, United lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 750, and, on that basis, denies them.

751. Plaintiffs have characterized the allegations in this paragraph as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, and because the allegations in this paragraph concern specific claims, but fail to provide necessary claims-identifying information, United lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 751, and, on that basis, denies them.

752. Plaintiffs have characterized the allegations in this paragraph as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, and because the allegations in this paragraph concern specific claims, but fail to provide necessary claims-identifying information, United lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 752, and, on that basis, denies them.

753. Plaintiffs have characterized the allegations in this paragraph as a “Predicate Act”

in support of Counts I and II of the Complaint. However, because the Court's September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, and because the allegations in this paragraph concern specific claims, but fail to provide necessary claims-identifying information, United lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 753, and, on that basis, denies them.

754. Plaintiffs have characterized the allegations in this paragraph as a "Predicate Act" in support of Counts I and II of the Complaint. However, because the Court's September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, United denies the allegations in Paragraph 754.

755. Plaintiffs have characterized the allegations in this paragraph as a "Predicate Act" in support of Counts I and II of the Complaint. However, because the Court's September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, United denies the allegations in Paragraph 755.

756. Plaintiffs have characterized the allegations in this paragraph as a "Predicate Act" in support of Counts I and II of the Complaint. However, because the Court's September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, United denies the allegations in Paragraph 756.

757. Plaintiffs have characterized the allegations in this paragraph as a "Predicate Act" in support of Counts I and II of the Complaint. However, because the Court's September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, United denies the allegations in Paragraph 757.

758. Plaintiffs have characterized the allegations in this paragraph as a "Predicate Act"

in support of Counts I and II of the Complaint. However, because the Court's September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, United denies the allegations in Paragraph 758.

759. Plaintiffs have characterized the allegations in this paragraph as a "Predicate Act" in support of Counts I and II of the Complaint. However, because the Court's September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, and because the allegations in this paragraph concern specific claims, but fail to provide necessary claims-identifying information, United lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 759, and, on that basis, denies them.

760. Plaintiffs have characterized the allegations in this paragraph as a "Predicate Act" in support of Counts I and II of the Complaint. However, because the Court's September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, and because the allegations in this paragraph concern specific claims, but fail to provide necessary claims-identifying information, United lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 760, and, on that basis, denies them.

761. Plaintiffs have characterized the allegations in this paragraph as a "Predicate Act" in support of Counts I and II of the Complaint. However, because the Court's September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, and because the allegations in this paragraph concern specific claims, but fail to provide necessary claims-identifying information, United lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 761, and, on that basis,

denies them.

762. Plaintiffs have characterized the allegations in this paragraph as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, and because the allegations in this paragraph concern specific claims, but fail to provide necessary claims-identifying information, United lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 762, and, on that basis, denies them.

763. Plaintiffs have characterized the allegations in this paragraph as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, and because the allegations in this paragraph concern specific claims, but fail to provide necessary claims-identifying information, United lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 763, and, on that basis, denies them.

764. Plaintiffs have characterized the allegations in this paragraph as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, and because the allegations in this paragraph concern specific claims, but fail to provide necessary claims-identifying information, United lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 764, and, on that basis, denies them.

765. Plaintiffs have characterized the allegations in this paragraph as a “Predicate Act”

in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, and because the allegations in this paragraph concern specific claims, but fail to provide necessary claims-identifying information, United lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 765, and, on that basis, denies them.

766. Plaintiffs have characterized the allegations in this paragraph as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, and because the allegations in this paragraph concern specific claims, but fail to provide necessary claims-identifying information, United lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 766, and, on that basis, denies them.

767. Plaintiffs have characterized the allegations in this paragraph as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, and because the allegations in this paragraph concern specific claims, but fail to provide necessary claims-identifying information, United lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 767, and, on that basis, denies them.

768. Plaintiffs have characterized the allegations in this paragraph as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a



response is required, United denies the allegations in Paragraph 768.

769. Plaintiffs have characterized the allegations in this paragraph as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, United denies the allegations in Paragraph 769.

770. Plaintiffs have characterized the allegations in this paragraph as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, United denies the allegations in Paragraph 770.

771. Plaintiffs have characterized the allegations in this paragraph as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, United denies the allegations in Paragraph 771.

772. Plaintiffs have characterized the allegations in this paragraph as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, United denies the allegations in Paragraph 772.

773. Plaintiffs have characterized the allegations in this paragraph as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, United denies the allegations in Paragraph 773.

774. Plaintiffs have characterized the allegations in this paragraph as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021

order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, United denies the allegations in Paragraph 774.

775. Plaintiffs have characterized the allegations in this paragraph as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, United denies the allegations in Paragraph 775.

776. Plaintiffs have characterized the allegations in this paragraph as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, United denies the allegations in Paragraph 776.

777. Plaintiffs have characterized the allegations in this paragraph as a “Predicate Act” in support of Counts I and II of the Complaint. However, because the Court’s September 28, 2021 order dismissed Counts I and II of the Complaint, no response is required. To the extent that a response is required, United denies the allegations in Paragraph 777.

778. The allegations in Paragraph 778 do not warrant a response in light of the Court’s September 28, 2021 order granting United’s Motion to Dismiss in part. To the extent any response is required, United denies the allegations in Paragraph 778.

779. The allegations in Paragraph 779 do not warrant a response in light of the Court’s September 28, 2021 order granting United’s Motion to Dismiss in part. To the extent any response is required, United denies the allegations in Paragraph 779.

780. The allegations in Paragraph 780 do not warrant a response in light of the Court’s September 28, 2021 order granting United’s Motion to Dismiss in part. To the extent any response is required, United denies the allegations in Paragraph 780.

781. The allegations in Paragraph 781 do not warrant a response in light of the Court's September 28, 2021 order granting United's Motion to Dismiss in part. To the extent any response is required, United denies the allegations in Paragraph 781.

782. The allegations in Paragraph 782 do not warrant a response in light of the Court's September 28, 2021 order granting United's Motion to Dismiss in part. To the extent any response is required, United denies the allegations in Paragraph 782.

783. The allegations in Paragraph 783 do not warrant a response in light of the Court's September 28, 2021 order granting United's Motion to Dismiss in part. To the extent any response is required, United denies the allegations in Paragraph 783.

784. The allegations in Paragraph 784 do not warrant a response in light of the Court's September 28, 2021 order granting United's Motion to Dismiss in part. To the extent any response is required, United denies the allegations in Paragraph 784.

785. The allegations in Paragraph 785 do not warrant a response in light of the Court's September 28, 2021 order granting United's Motion to Dismiss in part. To the extent any response is required, United denies the allegations in Paragraph 785.

786. The allegations in Paragraph 786 do not warrant a response in light of the Court's September 28, 2021 order granting United's Motion to Dismiss in part. To the extent any response is required, United denies the allegations in Paragraph 786.

787. The allegations in Paragraph 787 do not warrant a response in light of the Court's September 28, 2021 order granting United's Motion to Dismiss in part. To the extent any response is required, United denies the allegations in Paragraph 787.

788. The allegations in Paragraph 788 do not warrant a response in light of the Court's September 28, 2021 order granting United's Motion to Dismiss in part. To the extent any response

is required, United denies the allegations in Paragraph 788.

789. The allegations in Paragraph 789 do not warrant a response in light of the Court's September 28, 2021 order granting United's Motion to Dismiss in part. To the extent any response is required, United denies the allegations in Paragraph 789.

790. The allegations in Paragraph 790 do not warrant a response in light of the Court's September 28, 2021 order granting United's Motion to Dismiss in part. To the extent any response is required, United denies the allegations in Paragraph 790.

791. Paragraph 791 sets forth legal conclusions that require no response. To the extent any further response is required, United denies the allegations in Paragraph 791.

792. Paragraph 792 sets forth legal conclusions that require no response. To the extent any further response is required, United denies the allegations in Paragraph 792.

793. Paragraph 793 sets forth legal conclusions that require no response. To the extent any further response is required, United denies the allegations in Paragraph 793.

794. Paragraph 794 sets forth legal conclusions that require no response. To the extent any further response is required, United lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 794, and on that basis, denies them.

795. Paragraph 795 sets forth legal conclusions that require no response. To the extent any further response is required, United denies the allegations in Paragraph 795.

796. Paragraph 796 sets forth legal conclusions that require no response. To the extent any further response is required, United denies the allegations in Paragraph 796.

797. Paragraph 797 sets forth legal conclusions that require no response. To the extent any further response is required, United denies the allegations in Paragraph 797.

798. Paragraph 798 sets forth legal conclusions that require no response. To the extent

any further response is required, United denies the allegations in Paragraph 798.

799. Paragraph 799 sets forth legal conclusions that require no response. To the extent any further response is required, United denies the allegations in Paragraph 799.

800. The allegations in Paragraph 800 do not warrant a response in light of the Court's September 28, 2021 order granting United's Motion to Dismiss in part. To the extent any response is required, United denies the allegations in Paragraph 800.

801. The allegations in Paragraph 801 do not warrant a response in light of the Court's September 28, 2021 order granting United's Motion to Dismiss in part. To the extent any response is required, United denies the allegations in Paragraph 801.

802. The allegations in Paragraph 802 do not warrant a response in light of the Court's September 28, 2021 order granting United's Motion to Dismiss in part. To the extent any response is required, United denies the allegations in Paragraph 802.

803. The allegations in Paragraph 803 do not warrant a response in light of the Court's September 28, 2021 order granting United's Motion to Dismiss in part. To the extent any response is required, United denies the allegations in Paragraph 803.

804. The allegations in Paragraph 804 do not warrant a response in light of the Court's September 28, 2021 order granting United's Motion to Dismiss in part. To the extent any response is required, United denies the allegations in Paragraph 804.

805. The allegations in Paragraph 805 do not warrant a response in light of the Court's September 28, 2021 order granting United's Motion to Dismiss in part. To the extent any response is required, United denies the allegations in Paragraph 805.

806. The allegations in Paragraph 806 do not warrant a response in light of the Court's September 28, 2021 order granting United's Motion to Dismiss in part. To the extent any response

is required, United denies the allegations in Paragraph 806.

807. The allegations in Paragraph 807 do not warrant a response in light of the Court's September 28, 2021 order granting United's Motion to Dismiss in part. To the extent any response is required, United denies the allegations in Paragraph 807.

808. The allegations in Paragraph 808 do not warrant a response in light of the Court's September 28, 2021 order granting United's Motion to Dismiss in part. To the extent any response is required, United denies the allegations in Paragraph 808.

809. The allegations in Paragraph 809 do not warrant a response in light of the Court's September 28, 2021 order granting United's Motion to Dismiss in part. To the extent any response is required, United denies the allegations in Paragraph 809.

810. The allegations in Paragraph 810 do not warrant a response in light of the Court's September 28, 2021 order granting United's Motion to Dismiss in part. To the extent any response is required, United denies the allegations in Paragraph 810.

811. The allegations in Paragraph 811 do not warrant a response in light of the Court's September 28, 2021 order granting United's Motion to Dismiss in part. To the extent any response is required, United denies the allegations in Paragraph 811.

812. The allegations in Paragraph 812 do not warrant a response in light of the Court's September 28, 2021 order granting United's Motion to Dismiss in part. To the extent any response is required, United denies the allegations in Paragraph 812.

813. The allegations in Paragraph 813 do not warrant a response in light of the Court's September 28, 2021 order granting United's Motion to Dismiss in part. To the extent any response is required, United denies the allegations in Paragraph 813.

814. The allegations in Paragraph 814 do not warrant a response in light of the Court's

September 28, 2021 order granting United's Motion to Dismiss in part. To the extent any response is required, United denies the allegations in Paragraph 814.

815. The allegations in Paragraph 815 do not warrant a response in light of the Court's September 28, 2021 order granting United's Motion to Dismiss in part. To the extent any response is required, United denies the allegations in Paragraph 815.

816. The allegations in Paragraph 816 do not warrant a response in light of the Court's September 28, 2021 order granting United's Motion to Dismiss in part. To the extent any response is required, United denies the allegations in Paragraph 816.

817. The allegations in Paragraph 817 do not warrant a response in light of the Court's September 28, 2021 order granting United's Motion to Dismiss in part. To the extent any response is required, United denies the allegations in Paragraph 817.

818. The allegations in Paragraph 818 do not warrant a response in light of the Court's September 28, 2021 order granting United's Motion to Dismiss in part. To the extent any response is required, United denies the allegations in Paragraph 818.

819. The allegations in Paragraph 819 do not warrant a response in light of the Court's September 28, 2021 order granting United's Motion to Dismiss in part. To the extent any response is required, United denies the allegations in Paragraph 819.

820. The allegations in Paragraph 820 do not warrant a response in light of the Court's September 28, 2021 order granting United's Motion to Dismiss in part. To the extent any response is required, United denies the allegations in Paragraph 820.

821. The allegations in Paragraph 821 do not warrant a response in light of the Court's September 28, 2021 order granting United's Motion to Dismiss in part. To the extent any response is required, United denies the allegations in Paragraph 821.

822. The allegations in Paragraph 822 do not warrant a response in light of the Court's September 28, 2021 order granting United's Motion to Dismiss in part. To the extent any response is required, United denies the allegations in Paragraph 822.

823. The allegations in Paragraph 823 do not warrant a response in light of the Court's September 28, 2021 order granting United's Motion to Dismiss in part. To the extent any response is required, United denies the allegations in Paragraph 823.

824. The allegations in Paragraph 824 do not warrant a response in light of the Court's September 28, 2021 order granting United's Motion to Dismiss in part. To the extent any response is required, United denies the allegations in Paragraph 824.

825. The allegations in Paragraph 825 do not warrant a response in light of the Court's September 28, 2021 order granting United's Motion to Dismiss in part. To the extent any response is required, United denies the allegations in Paragraph 825.

826. The allegations in Paragraph 826 do not warrant a response in light of the Court's September 28, 2021 order granting United's Motion to Dismiss in part. To the extent any response is required, United denies the allegations in Paragraph 826.

827. The allegations in Paragraph 827 do not warrant a response in light of the Court's September 28, 2021 order granting United's Motion to Dismiss in part. To the extent any response is required, United denies the allegations in Paragraph 827.

828. The allegations in Paragraph 828 do not warrant a response in light of the Court's September 28, 2021 order granting United's Motion to Dismiss in part. To the extent any response is required, United denies the allegations in Paragraph 828.

829. The allegations in Paragraph 829 do not warrant a response in light of the Court's September 28, 2021 order granting United's Motion to Dismiss in part. To the extent any response



is required, United denies the allegations in Paragraph 829.

830. The allegations in Paragraph 830 do not warrant a response in light of the Court's September 28, 2021 order granting United's Motion to Dismiss in part. To the extent any response is required, United denies the allegations in Paragraph 830.

831. The allegations in Paragraph 831 do not warrant a response in light of the Court's September 28, 2021 order granting United's Motion to Dismiss in part. To the extent any response is required, United denies the allegations in Paragraph 831.

832. The allegations in Paragraph 832 do not warrant a response in light of the Court's September 28, 2021 order granting United's Motion to Dismiss in part. To the extent any response is required, United denies the allegations in Paragraph 832.

833. The allegations in Paragraph 833 do not warrant a response in light of the Court's September 28, 2021 order granting United's Motion to Dismiss in part. To the extent any response is required, United denies the allegations in Paragraph 833.

834. The allegations in Paragraph 834 do not warrant a response in light of the Court's September 28, 2021 order granting United's Motion to Dismiss in part. To the extent any response is required, United denies the allegations in Paragraph 834.

835. The allegations in Paragraph 835 do not warrant a response in light of the Court's September 28, 2021 order granting United's Motion to Dismiss in part. To the extent any response is required, United denies the allegations in Paragraph 835.

836. The allegations in Paragraph 836 do not warrant a response in light of the Court's September 28, 2021 order granting United's Motion to Dismiss in part. To the extent any response is required, United denies the allegations in Paragraph 836.

837. The allegations in Paragraph 837 do not warrant a response in light of the Court's

September 28, 2021 order granting United's Motion to Dismiss in part. To the extent any response is required, United denies the allegations in Paragraph 837.

838. The allegations in Paragraph 838 do not warrant a response in light of the Court's September 28, 2021 order granting United's Motion to Dismiss in part. To the extent any response is required, United denies the allegations in Paragraph 838.

839. The allegations in Paragraph 839 do not warrant a response in light of the Court's September 28, 2021 order granting United's Motion to Dismiss in part. To the extent any response is required, United denies the allegations in Paragraph 839.

840. The allegations in Paragraph 840 do not warrant a response in light of the Court's September 28, 2021 order granting United's Motion to Dismiss in part. To the extent any response is required, United denies the allegations in Paragraph 840.

841. The allegations in Paragraph 841 do not warrant a response in light of the Court's September 28, 2021 order granting United's Motion to Dismiss in part. To the extent any response is required, United denies the allegations in Paragraph 841.

842. The allegations in Paragraph 842 do not warrant a response in light of the Court's September 28, 2021 order granting United's Motion to Dismiss in part. To the extent any response is required, United denies the allegations in Paragraph 842.

843. The allegations in Paragraph 843 do not warrant a response in light of the Court's September 28, 2021 order granting United's Motion to Dismiss in part. To the extent any response is required, United denies the allegations in Paragraph 843.

844. The allegations in Paragraph 844 do not warrant a response in light of the Court's September 28, 2021 order granting United's Motion to Dismiss in part. To the extent any response is required, United denies the allegations in Paragraph 844.

845. The allegations in Paragraph 845 do not warrant a response in light of the Court's September 28, 2021 order granting United's Motion to Dismiss in part. To the extent any response is required, United denies the allegations in Paragraph 845.

846. United incorporates and reasserts its responses to the allegations in the Complaint as if fully set forth herein.

847. United denies the allegations in Paragraph 847.

848. United denies the allegations in Paragraph 848.

849. Paragraph 849 sets forth legal conclusions to which no response is required. To the extent any response is required, United denies the allegations in Paragraph 849.

850. Paragraph 850 sets forth legal conclusions to which no response is required. To the extent any response is required, United denies the allegations in Paragraph 850.

851. United admits that several Plaintiffs have provided medical services to some members of health plans insured or administered by some United subsidiaries. The remaining allegations in Paragraph 851 set forth legal conclusions that require no response. To the extent any further response is required, United denies the allegations in Paragraph 851.

852. Paragraph 852 sets forth legal conclusions to which no response is required. The terms and conditions of member benefit plans speak for themselves. To the extent any response is required, United denies the allegations in Paragraph 852.

853. Paragraph 853 sets forth legal conclusions to which no response is required. To the extent any response is required, United denies the allegations in Paragraph 853.

854. Paragraph 854 sets forth legal conclusions to which no response is required. To the extent any response is required, United denies the allegations in Paragraph 854.

855. Paragraph 855 sets forth legal conclusions to which no response is required. To the

extent any response is required, United denies the allegations in Paragraph 855.

856. United denies that it is liable to Plaintiffs in any fashion or in any amount. United denies the remaining allegations in Paragraph 856.

857. United incorporates and reasserts its responses to the allegations in the Complaint as if fully set forth herein.

858. Paragraph 858 sets forth legal conclusions to which no response is required. To the extent any response is required, United denies the allegations in Paragraph 858.

859. Paragraph 859 sets forth legal conclusions to which no response is required. United lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 859 and, on that basis, denies them.

860. Paragraph 860 sets forth legal conclusions to which no response is required. To the extent any response is required, United denies the allegations set forth in Paragraph 860.

861. United denies that it is liable to Plaintiffs in any fashion or in any amount. United denies the remaining allegations in Paragraph 861.

862. United denies that it is liable to Plaintiffs in any fashion or in any amount. United denies the remaining allegations in Paragraph 862.

863. United denies that it is liable to Plaintiffs in any fashion or in any amount. Paragraph 863 sets forth legal conclusions to which no response is required. To the extent any response is required, United denies the allegations in Paragraph 863.

### **AFFIRMATIVE DEFENSES**

United has not yet completed its investigation in this matter. Notably, Plaintiffs have failed to adequately plead the specific claims at issue in a manner that would allow United to identify each relevant claim, including the individual members/patients involved, the health care coverage they possessed on the dates of service at issue, the terms of their various health plans, the specific services rendered, and the payment and processing history to date. Without such basic identification, United is unable to respond to certain allegations in the Complaint concerning the specific claims at issue. United reserves all rights to alter or amend its responsive pleading and affirmative defenses, including at such time as Plaintiffs provide the information necessary to identify the specific claims at issue.

Without assuming the burden of proof where it otherwise rests with Plaintiffs, United asserts the following affirmative defenses as may prove applicable after discovery and/or trial:

#### **FIRST AFFIRMATIVE DEFENSE**

For the remaining causes of action after the Court's September 28, 2021 order granting United's Motion to Dismiss in part, Plaintiffs' Complaint fails to state a claim upon which relief can be granted.

#### **SECOND AFFIRMATIVE DEFENSE**

To the extent to be determined through review of subsequently identified claims, some or all of the disputed claims are preempted by the Employee Retirement Income Security Act of 1974 ("ERISA") because the members/patients in question obtained their health care coverage through employer-based health plans. Plaintiffs' remaining state law claims relate to payments under plans governed by ERISA, and all such claims are preempted by ERISA.

#### **THIRD AFFIRMATIVE DEFENSE**

Plaintiffs' remaining state law claims are barred by the absence of an applicable duty running from United to Plaintiffs. Among other reasons, as out-of-network providers, Plaintiffs have chosen not to enter into any contractual relationship or network agreement with United dictating payment terms, nor has any duty arisen by operation of New York law.

#### **FOURTH AFFIRMATIVE DEFENSE**

The terms and conditions of all operative health plans are incorporated by reference as if fully set forth herein, and stand as a bar to some or all of the relief requested. United reserves all rights with respect to asserting this defense once Plaintiffs have adequately identified the specific benefit claims that they contend were underpaid for purposes of the lawsuit, and the specific health plans at issue.

#### **FIFTH AFFIRMATIVE DEFENSE**

Upon information and belief, some or all of Plaintiffs' billed charges are excessive under applicable standards, and/or Plaintiffs have failed to identify any basis for entitlement to demand receipt of any fixed percentage of billed charges.

#### **SIXTH AFFIRMATIVE DEFENSE**

Upon information and belief, some or all of the claims asserted are untimely, and/or subject to statute of limitations or contractual limitations periods. United reserves all rights with respect to asserting this defense once Plaintiffs have adequately identified the specific benefit claims that they contend were underpaid for purposes of the lawsuit, and the specific health plans at issue.

#### **SEVENTH AFFIRMATIVE DEFENSE**

Upon information and belief, some or all of the claims asserted are subject to rates set by Plaintiffs' participation in wrap rental or leased network for out-of-network care. United reserves all rights with respect to asserting this defense once Plaintiffs have adequately identified the specific benefit claims that they contend were underpaid for purposes of the lawsuit, and the specific health plans at issue.

#### **EIGHTH AFFIRMATIVE DEFENSE**

To the extent that Plaintiffs have any right to receive health plan benefits, that right is subject to basic preconditions and prerequisites that have not been established, such as that the patients are members or beneficiaries of a health plan insured or administered by United on the at-issue date of service, that the coordination of benefits has been applied, that the services were medically necessary, that an emergency medical condition was present, that Plaintiffs timely submitted

correctly coded claims and supplied any requested documentation, that any necessary authorizations were obtained prior to rendering the reported services to United's members, and that any requirements of administrative exhaustion were satisfied. Therefore, Plaintiffs' remaining state law claims for relief are barred, in whole or in part, to the extent they seek to recover amounts for services where: (i) Plaintiffs submitted benefit claims for services not actually performed; (ii) Plaintiffs submitted multiple benefit claims for the same services performed or associated costs; (iii) Plaintiffs seek reimbursement using incorrect procedural terminology or other billing codes in the submission of their claims, including, for example, where Plaintiffs submitted a claim using a Current Procedural Terminology ("CPT") code that was not justified under the circumstances; (iv) Plaintiffs seek reimbursement for services rendered after Plaintiffs provided an improper kickback or other improper benefit to the patient (including where Plaintiffs improperly waived or paid the patient's co-payment, coinsurance, deductible, or other amount that the patient was legally obligated to pay); (v) Plaintiffs seek reimbursement for amounts that fail to take into account co-payment, coinsurance, deductibles that must be recovered as a matter of law and/or industry practice and/or any other terms, conditions, exclusions, or limitations of the underlying United benefit plans; and/or (vi) Plaintiffs failed to exhaust mandatory administrative and/or contractual remedies. United reserves all rights with respect to asserting this defense once Plaintiffs have adequately identified the specific benefit claims that they contend were underpaid for purposes of the lawsuit, and the specific health plans at issue.

#### **NINTH AFFIRMATIVE DEFENSE**

Upon information and belief, Plaintiffs lack standing to pursue all or part of the claims in this action, including because United did not function as an insurer or issuer of the unspecified health plan coverage alleged to be at issue, nor was United responsible for administering the specific health plans or adjudicating the specific benefit claims Plaintiffs contend were underpaid for purposes of the lawsuit. United reserves all rights with respect to asserting this defense once Plaintiffs have adequately identified the specific benefit claims that they contend were underpaid for purposes of the lawsuit, and the specific health plans at issue.

#### **TENTH AFFIRMATIVE DEFENSE**

Plaintiffs' claims are barred, in whole or in part, to the extent Plaintiffs are pursuing claims that they do not possess the legal right to pursue, including benefit claims with respect to which they did not obtain effective assignments from their patients, and benefit claims with respect to which United did not function as an insurer or issuer of the health plan coverage for some or all of the benefit claims alleged to be at issue, and Plaintiffs therefore lack standing as to United. United reserves all rights with respect to asserting this defense once Plaintiffs have adequately identified the specific benefit claims that they contend were underpaid for purposes of the lawsuit, and the specific health plans at issue.

#### **ELEVENTH AFFIRMATIVE DEFENSE**

Plaintiffs' claims are barred, in whole or in part, to the extent that they seek to unjustly enrich Plaintiffs by allowing them to retain funds in excess of any amounts appropriately due for covered services under plans insured or administered by United. United reserves all rights with respect to asserting this defense once Plaintiffs have adequately identified the specific benefit claims that they contend were underpaid for purposes of the lawsuit, and the specific health plans at issue.

#### **TWELFTH AFFIRMATIVE DEFENSE**

Plaintiffs' claims are barred, in whole or in part, to the extent they have not suffered any damages.

#### **THIRTEENTH AFFIRMATIVE DEFENSE**

Plaintiffs' claims are barred, in whole or in part, to the extent that Plaintiffs have not mitigated their damages by seeking reimbursement from other sources, including other health plans, programs, or entities that may have had an obligation to pay for the emergency medical services allegedly rendered by Plaintiffs. United reserves all rights with respect to asserting this defense once Plaintiffs have adequately identified the specific benefit claims that they contend were underpaid for purposes of the lawsuit, and the specific health plans at issue.

#### **FOURTEENTH AFFIRMATIVE DEFENSE**



Plaintiffs' claims are barred, in whole or in part, by the equitable doctrines of waiver, estoppel, laches, and/or unclean hands. United reserves all rights with respect to asserting this defense once Plaintiffs have adequately identified the specific benefit claims that they contend were underpaid for purposes of the lawsuit, and the specific plans at issue.

**FIFTEENTH AFFIRMATIVE DEFENSE**

Plaintiffs' claims are barred, in whole or in part, to the extent Plaintiffs failed to sue the appropriate legal entity. United reserves all rights with respect to asserting this defense once Plaintiffs have adequately identified the specific benefit claims that they contend were underpaid for purposes of the lawsuit, and the specific plans at issue.

**SIXTEENTH AFFIRMATIVE DEFENSE**

Plaintiffs' claims are barred, in whole or in part, by the doctrines of accord and satisfaction and/or release. United reserves all rights with respect to asserting this defense once Plaintiffs have adequately identified the specific benefit claims that they contend were underpaid for purposes of the lawsuit, and the specific health plans at issue.

**SEVENTEENTH AFFIRMATIVE DEFENSE**

Upon information and belief, Plaintiffs' claims are subject to setoff and/or recoupment with respect to claims for which United made payment on the basis of CPT or other billing codes included in Plaintiffs' submissions that Plaintiffs' clinical records of their patients' care reveal to have been improperly submitted, either because Plaintiffs' clinical records do not support submission of the codes at all, or because Plaintiffs' clinical records establish that different codes should have been submitted. United reserves all rights with respect to asserting this defense once Plaintiffs have adequately identified the specific benefit claims that they contend were underpaid for purposes of the lawsuit, and the specific health plans at issue.

**EIGHTEENTH AFFIRMATIVE DEFENSE**

Plaintiffs' claims are barred to the extent the monetary relief sought under theories of restitution, disgorgement, constructive trust and/or any other theory is not equitable, and thus not available under those theories.

#### **NINETEENTH AFFIRMATIVE DEFENSE**

Based on information and belief, Plaintiffs' claims are subject to setoff and/or recoupment with respect to the claims at issue (1) for which United made payment on the basis of Plaintiffs' billed charges, and those billed charges exceeded the billed charges submitted to other payors, or (2) where the charges were otherwise in error, unreasonable, unfair, not usual and customary, did not represent the reasonable value of Plaintiffs' services rendered to United's members, or are otherwise inequitable or unlawful under New York law.

#### **TWENTIETH AFFIRMATIVE DEFENSE**

Based on information and belief, Plaintiffs are not entitled to relief because they have received all payments due, if any, for the covered services they rendered to members of health plans insured or administer by United in accordance with the terms of their patients' health plans. United reserves all rights with respect to asserting this defense once Plaintiffs have adequately identified the specific benefit claims that they contend were underpaid for purposes of the lawsuit, and the specific health plans at issue.

#### **TWENTY-FIRST AFFIRMATIVE DEFENSE**

Plaintiffs' claims are barred, in whole or in part, by the doctrines of res judicata and/or collateral estoppel. United reserves all rights with respect to asserting this defense once Plaintiffs have adequately identified the specific benefit claims that they contend were underpaid for purposes of the lawsuit, and the specific health plans at issue.

#### **TWENTY-SECOND AFFIRMATIVE DEFENSE**

Plaintiffs are not entitled to relief to the extent that Plaintiffs participated in any shared savings program or a wrap rental or leased network for out-of-network care in that Plaintiffs are bound by such programs and may not recover amounts above and beyond those which are controlled by such programs. United reserves all rights with respect to asserting this defense once Plaintiffs have adequately identified the specific benefit claims that they contend were underpaid for purposes of the lawsuit, and the specific health plans at issue.

#### **TWENTY-THIRD AFFIRMATIVE DEFENSE**

Plaintiffs' claims are barred, in whole or in part, because Plaintiffs' conduct constitutes a failure to act in a commercially reasonable manner. Plaintiffs are demanding commercially unreasonable charges and reimbursement rates far in excess of the "usual and customary" rates paid for equivalent services, and thereby undermining the New York statutes regarding reimbursement for out-of-network services. United reserves all rights with respect to asserting this defense once Plaintiffs have adequately identified the specific benefit claims that they contend were underpaid for purposes of the lawsuit, and the specific health plans at issue.

#### **TWENTY-FOURTH AFFIRMATIVE DEFENSE**

Plaintiffs' prayer for punitive damages cannot be sustained because an award of punitive damages that is subject to no predetermined limit, such as a maximum multiple of compensatory damages or a maximum amount of punitive damages that may be imposed, would: (1) violate United's Due Process rights guaranteed by the Fifth and Fourteenth Amendments to the United States Constitution; (2) violate United's rights not to be subjected to an excessive award; and (3) be improper under the New York Constitution, New York statutes, common law and public policies of New York.

#### **TWENTY-FIFTH AFFIRMATIVE DEFENSE**

It has been necessary for United to employ the services of an attorney to defend the action and a reasonable sum should be allowed United for attorney's fees and all incurred costs of the suit.

#### **TWENTY-SIXTH AFFIRMATIVE DEFENSE**

United reserves the right to assert, and hereby gives notice that it intends to rely upon, any other defense that may become available during discovery proceedings or otherwise in this case and hereby reserves the right to amend its Answer to assert any such defense.

Dated: October 25, 2021

Respectfully submitted,

/s/ Greg Jacob

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